

**PERMIT NO. 3711-029-0015-P-01-0**

**ISSUANCE DATE:**



**GEORGIA**

DEPARTMENT OF NATURAL RESOURCES

**ENVIRONMENTAL PROTECTION DIVISION**

## **Air Quality Permit**

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

**Facility Name:** Hyundai Motor Group Metaplant America, LLC

**Facility Address:** 9728 Hwy 280 E  
Ellabell, Georgia 31308 Bryan County

**Mailing Address:** 10550 Talbert Ave.  
Fountain Valley, CA 92708

**Facility AIRS Number:** 04-13-029-00015

is issued a Permit for the following:

**Construction and operation of an automobile and light-duty truck manufacturing plant, and affiliated operations.**

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 and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. **28503** dated August 16, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals 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 **80** pages.



Richard E. Dunn, Director  
Environmental Protection Division

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**Table of Contents**

|                 |  |           |
|-----------------|--|-----------|
| <b>PART 1.0</b> | <b>FACILITY DESCRIPTION .....</b>  | <b>1</b>  |
| 1.1             | Site Determination .....   | 1         |
| 1.2             | Previous and/or Other Names .....  | 1         |
| 1.3             | Overall Facility Process Description.....  | 2         |
| <b>PART 2.0</b> | <b>REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY .....</b>  | <b>4</b>  |
| 2.1             | Facility Wide Emission Caps and Operating Limits.....  | 4         |
| 2.2             | Facility Wide Federal Rule Standards.....  | 4         |
| 2.3             | Facility Wide SIP Rule Standards .....   | 4         |
| 2.4             | Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission<br>Cap or Operating Limit ..... | 4         |
| <b>PART 3.0</b> | <b>REQUIREMENTS FOR EMISSION UNITS .....</b>   | <b>5</b>  |
| 3.1             | Emission Units .....   | 5         |
| 3.2             | Equipment Emission Caps and Operating Limits .....   | 10        |
| 3.3             | Equipment Federal Rule Standards .....   | 13        |
| 3.4             | Equipment SIP Rule Standards .....   | 23        |
| 3.5             | Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap<br>or Operating Limit .....     | 26        |
| <b>PART 4.0</b> | <b>REQUIREMENTS FOR TESTING.....</b>   | <b>27</b> |
| 4.1             | General Testing Requirements .....   | 27        |
| 4.2             | Specific Testing Requirements .....  | 29        |
| <b>PART 5.0</b> | <b>REQUIREMENTS FOR MONITORING (Related to Data Collection) .....</b>  | <b>33</b> |
| 5.1             | General Monitoring Requirements.....   | 33        |
| 5.2             | Specific Monitoring Requirements .....   | 33        |
| <b>PART 6.0</b> | <b>RECORD KEEPING AND REPORTING REQUIREMENTS .....</b>   | <b>39</b> |
| 6.1             | General Record Keeping and Reporting Requirements .....  | 39        |
| 6.2             | Specific Record Keeping and Reporting Requirements.....  | 42        |
| <b>PART 7.0</b> | <b>OTHER SPECIFIC REQUIREMENTS.....</b>  | <b>78</b> |
| 7.14            | Specific Conditions .....  | 78        |
| <b>PART 8.0</b> | <b>GENERAL PROVISIONS .....</b>  | <b>79</b> |
| 8.10            | Modifications .....  | 79        |
| 8.15            | Circumvention.....   | 79        |
| 8.17            | Operational Practices .....  | 79        |

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

## **PART 1.0 FACILITY DESCRIPTION**

### **1.1 Site Determination**

Hyundai Motor Group Metaplant America, LLC (hereinafter “HMGMA” or “facility”) will construct and operate an automobile assembly plant (“OEM”) at the “Bryan County Mega Site” which was developed by the State of Georgia. HMGMA will also be responsible for the construction under this permit of other operations (referred to as Glovis, Mobis, Transys, and Hyundai Steel, which operations are identified further in this permit) and HMGMA will sublease these operations to other Hyundai related companies that will operate those sources under the air permit held by HMGMA. Glovis, Mobis, Transys, and Hyundai Steel are collectively referred to as “AFF”. AFF operations are considered part of the same stationary source as OEM. OEM and AFF are referred to together as “OEM/AFF” and, to simplify things for this permit, their overall operation will collectively be referred to as being conducted by “Hyundai” or “Permittee” for purposes of the permit. HMGMA will have a designated corporate official that will be responsible for overall environmental aspects related to this air permit, for all covered operations.

A lithium-ion battery manufacturing plant (AIRS 029-00016) is also proposed to locate on the Mega Site. The battery plant will be partly owned by a Hyundai corporate entity, and partly owned by a separate third-party partner lithium-ion battery manufacturing company. Hyundai has represented that this joint venture will be structured so that the non-Hyundai battery partner company will have exclusive control over air pollution control decisions for the battery plant and will operate the battery plant so that it will neither be under the control of the same person as OEM/AFF nor persons under common control.

Based on the classifications and classification scheme in the 1972 Standard Industrial Classification (“SIC”) Manual, the HMGMA facility is in SIC Industry Code 3711, “Motor Vehicles and Passenger Car Bodies,” within SIC Major Group 37, “Transportation Equipment.” The battery manufacturing plant is expected to be in SIC Industry Code 3691, “Storage Batteries,” within SIC Major Group 36, “Electrical and Electronic Machinery, Equipment, and Supplies.”

Hyundai has represented that, due to construction start date differences and contract negotiations with the battery partner, a separate air quality permit application for the separate battery plant will be submitted at a later date. Upon review of that permit application, if EPD confirms that the battery plant will neither be under the control of the same person as OEM/AFF nor persons under common control, or that the OEM/AFF activities and the battery plant activities are in separate industrial categories based on SIC Major Group, the battery plant will be issued a separate air permit for its operations. Should EPD determine that the battery plant will either be under the control of the same person as OEM/AFF or persons under common control, and will be in the same industrial category as OEM/AFF, the battery plant would be permitted as part of the same stationary source.

### **1.2 Previous and/or Other Names**

None

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

### **1.3 Overall Facility Process Description**

The OEM will assemble passenger vehicles from steel panels manufactured on-site and mechanical components and trim components fabricated elsewhere and shipped to the assembly plant just-in-time for assembly of vehicles. The OEM can be divided into four main manufacturing centers: press (stamping) shop, body shop, paint shop, and assembly shop. The OEM will have a nominal vehicle production capacity of 100 units per hour and 525,000 units per year. AFF will include manufacturing support and utilities such as boilers, air heating units, and emergency engines.

There will be one stamping shop that will consist of pressing and stamping to manufacture steel parts from steel. Emissions from this operation are expected to be negligible.

The body shop is designed such that it can handle any model. The majority of welding will be spot welding, which has no emissions. Welding of body panels and components and adhesive bonding in the body shop generate small amounts of particulate and VOC emissions.

There will be one paint shop handling all models. The paint shop is the primary source of emissions from the plant with VOC solvent and particulate emissions resulting from the surface coating operations. VOC emissions from the paint shop are minimized by use of waterborne coatings wherever technologically appropriate and add-on emission controls. Nitrogen oxides and other combustion products are generated by natural gas fired booth make-up air heaters and curing oven process heaters.

There will be one assembly shop, designed and permitted such that it can handle any model. In the assembly shop the painted body comes together with the interior components; preassembled motor, battery pack, chassis, and drive components; and other trim parts to complete the vehicle. Window glazing, miscellaneous adhesive use, and fluids filling will result in small amounts of VOC emissions. Prior to exiting the assembly shop, some vehicles may receive spot paint repair.

Support facilities include a small tank farm for fluids and utilities. NO<sub>x</sub> and other combustion products are emitted from natural gas-fired boilers, air supply houses (ASH), indirect ovens, rooftop air makeup units, emergency generators, and fire pumps.

Mobis (affiliate) will provide vehicle sub-assemblies to the OEM assembly shop. Emissions from the Mobis manufacturing processes are expected to be negligible, but the facility will have emergency generators and several small natural gas-fired rooftop units for comfort heat.

Transys (affiliate) will provide car seats to the OEM assembly shop. There will be minor PM emissions associated with the flexible foam production equipment associated with seat manufacturing. This plant will also have rooftop units and a generator.

Glovis (affiliate) will operate a vehicle processing center (VPC) located on site that will perform application of underbody wax, any necessary final paint touchup, and preparation for distribution. This plant will also have rooftop air makeup units, emergency generators, and fire pumps.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

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Hyundai Steel (affiliate) will operate a metal stamping and supply center. Emissions from Hyundai Steel's manufacturing processes are expected to be negligible, but the facility will have an emergency fire pump and several small natural gas-fired rooftop units for comfort heat.

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.1 Facility Wide Emission Caps and Operating Limits**

- 2.1.1 The Permittee shall limit the production rate of vehicles to no more than 525,000 units/cars during any twelve (12) consecutive months  
[PSD – PM NAAQS/Increment modeling compliance and Georgia Air Toxics Guidelines]
- 2.1.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the entire facility, volatile organic compounds (VOC) in amounts exceeding 491 tons during any twelve (12) consecutive months.  
[40 CFR 52.21(j)(2) – VOC BACT and Georgia Air Toxics Guidelines]

**2.2 Facility Wide Federal Rule Standards**

None applicable.

**2.3 Facility Wide SIP Rule Standards**

None applicable.

**2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None applicable.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**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 Emission Units**

| Emission Units                              |  | Specific Limitations/Requirements   | Air Pollution Control Devices |                               |
|---|--|---|-------------------------------|-------------------------------|
| ID No.                                      | Description  | Applicable Requirements/Standards   | ID No.                        | Description                   |
| <b>E-Coat Operations</b>                    |  |   |                               |                               |
| EDT1<br>EDT2                                | E-Coat Tanks (2)<br>(electrodeposition of waterborne primer coating) | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart MM<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | --                            | --                            |
| EOV1<br>EOV2                                | E-Coat Ovens (2)<br>(Indirect fired)                                 | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart DDDDD<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)  | RTO                           | Regenerative Thermal Oxidizer |
| <b>Guide coat (Spray Primer) Operations</b> |  |   |                               |                               |
| PSB1<br>PSB2                                | Guide coat (Primer) Spray Booths (2)                                 | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart MM<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | PSBF                          | Dry Filters                   |
| POV1<br>POV2                                | Guide coat Ovens (2)<br>(Indirect fired)                             | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart DDDDD<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)  | RTO                           | Regenerative Thermal Oxidizer |
| <b>Topcoat Operations</b>                   |  |   |                               |                               |
| BSB1<br>BSB2<br>BSB3                        | Topcoat Basecoat Spray Booths (3)                                    | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart MM<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | BSBF                          | Dry Filters                   |

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

| Emission Units                         |   | Specific Limitations/Requirements   | Air Pollution Control Devices                       |  |
|--|---|---|---|--|
| ID No.                                 | Description   | Applicable Requirements/Standards   | ID No.  | Description  |
| FA1<br>FA2<br>FA3                      | Topcoat Basecoat Flashoff Areas (3)<br>(Direct fired HAB) | 40 CFR 52.21<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)  | RTO   | Regenerative Thermal Oxidizer                        |
| CFD1<br>CFD2<br>CFD3                   | Topcoat Clearcoat Spray Booths (3)                        | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart MM<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | TCF<br><br>ZC1<br>(CFD1,<br>CFD2);<br>ZC2<br>(CFD3) | Dry Filters<br><br>Zeolite Rotary Concentrators /RTO |
| TOV1<br>TOV2<br>TOV3                   | Topcoat Clearcoat Ovens (3)<br>(indirect fired)           | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart DDDDD<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)  | RTO   | Regenerative Thermal Oxidizer                        |
| <b>Sealer and Underbody Operations</b> |   |   |   |  |
| SD1<br>SD2                             | Inner Sealer Booths (2)                                   | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t)  | -   | -  |
| UBS1<br>UBS2                           | Underbody sealer/Deadener/RPP Booths (2)                  | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t)  | FUB1  | Dry Filter   |
| UOV1                                   | Underbody Sealer (UBS) Oven<br>(indirect fired)           | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart DDDDD<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)  | RTO   | Regenerative Thermal Oxidizer                        |
| <b>Other Operations</b>                |   |   |   |  |
| CWD1<br>CWD2                           | Cavity Wax Booths (2)                                     | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t)  | FCW   | Dry Filter   |
| RB01                                   | Paint Shop Touch-Up Spray Booths (6)                      | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t)  | FRB1  | Dry Filter   |



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

| Emission Units            |  | Specific Limitations/Requirements  | Air Pollution Control Devices |             |
|---------------------------|--|--|-------------------------------|-------------|
| ID No.                    | Description                            | Applicable Requirements/Standards  | ID No.                        | Description |
| AWG1                      | Assembly Shop Window Glazing           | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | -                             | -           |
| APB1                      | Assembly Shop Final Repair Booths      | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | FAP1                          | Dry Filter  |
| <b>Sanding/Work Decks</b> |  |  |                               |             |
| ESD1<br>ESD2              | E-Coat Sanding (2)                     | 40 CFR 52.21<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | FES1                          | Dry Filter  |
| ERD1                      | E-Coat Heavy Repair                    | 40 CFR 52.21<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | FER1                          | Dry Filter  |
| PSD1                      | Guide Coat (Primer) Sanding (2)        | 40 CFR 52.21<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | FPS1                          | Dry Filter  |
| PSD2                      | Guide Coat (Primer) Heavy Repair       | 40 CFR 52.21<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | FPS1                          | Dry Filter  |
| TID1<br>TID2              | Topcoat Inspection/Sanding Booths (2)  | 40 CFR 52.21<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | FWR                           | Dry Filter  |
| RSD1                      | Final Repair Sanding                   | 40 CFR 52.21<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | FID1                          | Dry Filter  |
| <b>Body Shop</b>          |  |  |                               |             |
| BS1                       | Welding and Bonding                    | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t) | --                            | --          |
| <b>Utilities</b>          |  |  |                               |             |
| BO01-6                    | Boilers<br>6 x 8.3MMbtu/hr natural gas | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart DDDDD<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)                     | --                            | --          |

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

| Emission Units                        |  | Specific Limitations/Requirements  | Air Pollution Control Devices |             |
|---------------------------------------|--|--|-------------------------------|-------------|
| ID No.                                | Description  | Applicable Requirements/Standards  | ID No.                        | Description |
| GEN                                   | Plantwide Emergency Generators and Fire Pumps                    | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart IIII<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart ZZZZ<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | --                            | --          |
| TK1                                   | Tank Farm  | 40 CFR 63 Subpart A<br>40 CFR 63 Subpart EEEE  | --                            | --          |
| ASH                                   | Plantwide Air Supply Houses (direct-fired, natural gas)          | 40 CFR 52.21<br>391-3-1-.02(2)(g)  | --                            | --          |
| RTU1                                  | Plantwide Rooftop air makeup units (indirect fired, natural gas) | 40 CFR 52.21<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)   | --                            | --          |
| PMR                                   | Paint Mix Room   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | --                            | Filter      |
| CT1                                   | Cooling Tower 1  | 40 CFR 52.21   | --                            | --          |
| CT2                                   | Cooling Tower 2  | 40 CFR 52.21   | --                            | --          |
| CT3                                   | Cooling Tower 3  | 40 CFR 52.21   | --                            | --          |
| CT4                                   | Cooling Tower 4  | 40 CFR 52.21   | --                            | --          |
| CT5                                   | Cooling Tower 5  | 40 CFR 52.21   | --                            | --          |
| <b>Affiliated Facilities- Mobis</b>   |  |  |                               |             |
| MO                                    | Mobis BSA and Module Assembly                                    | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | --                            | --          |
| RTU2                                  | Plantwide Rooftop air makeup units (indirect fired, natural gas) | 40 CFR 52.21<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)   | --                            | --          |
| GEN                                   | Plantwide Emergency Generators and fire pumps                    | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart IIII<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart ZZZZ<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | --                            | --          |
| <b>Affiliated Facilities – Glovis</b> |  |  |                               |             |
| VPTU                                  | Vehicle Processing Center Paint Repair Booths                    | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)   | FVP                           | Dry Filter  |

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

| Emission Units                               |  | Specific Limitations/Requirements  | Air Pollution Control Devices |                |
|--|--|--|-------------------------------|----------------|
| ID No.                                       | Description  | Applicable Requirements/Standards  | ID No.                        | Description    |
|  |  | 391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t)   |                               |                |
| VPBW   | Vehicle Processing Center Underbody Wax application              | 40 CFR 52.21<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart IIII<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(t)                             | --                            | Dry Filter     |
| RTU3   | Plantwide Rooftop air makeup units (indirect fired, natural gas) | 40 CFR 52.21<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)   | --                            | --             |
| GEN  | Plantwide Emergency Generators and fire pumps                    | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart IIII<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart ZZZZ<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | --                            | --             |
| <b>Affiliated Facilities – Transys</b>       |  |  |                               |                |
| FFM  | Flexible Foam manufacturing                                      | 40 CFR 63 Subpart A<br>40 CFR 63 Subpart III<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)   | --                            | Dust Collector |
| RTU4   | Plantwide Rooftop air makeup units (indirect fired, natural gas) | 40 CFR 52.21<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)   | --                            | --             |
| GEN  | Plantwide Emergency Generators and fire pumps                    | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart IIII<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart ZZZZ<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | --                            | --             |
| <b>Affiliated Facilities – Hyundai Steel</b> |  |  |                               |                |
| RTU5   | Plantwide Rooftop air makeup units (indirect fired, natural gas) | 40 CFR 52.21<br>391-3-1-.02(2)(d)<br>391-3-1-.02(2)(g)   | --                            | --             |
| GEN  | Plantwide Emergency Generators and fire pumps                    | 40 CFR 52.21<br>40 CFR 60 Subpart A<br>40 CFR 60 Subpart IIII<br>40 CFR 63 Subpart A<br>40 CFR 63 Subpart ZZZZ<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | --                            | --             |

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

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

### 3.2 Equipment Emission Caps and Operating Limits

#### Best Available Control Technology – Emission Limits – 52.21(j)(2)

3.2.1 The Permittee shall not operate the following sources unless equipped with dry filters as specified in the table below:

[40 CFR 52.21(j)(2) – PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]

| Unit ID  | Unit Description                                      | Filter Type | Maximum Exhaust Grain Loading (filterable PM) |
|--|---|-------------|---|
| UBS1<br>UBS2   | UBS booths (2)  | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| PSB1<br>PSB2   | Guide coat Booths (2)                                 | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| BSB1<br>BSB2<br>BSB3   | Topcoat Basecoat Booths (3)                           | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| CFD1<br>CFD2<br>CFD3   | Topcoat Clearcoat booths (3)*                         | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| RB01,<br>APB1,<br>VPTU                                       | Touchup booths (paint shop, assembly, and Glovis VPC) | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| CWD1<br>CWD2   | Paint shop cavity wax booths (2)                      | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| VPBW   | VPC underbody wax booth                               | Dry Filter  | 0.001 g/m <sup>3</sup>                        |
| Unit ID  | Unit Description                                      | Filter Type |   |
| ESD1<br>ESD2<br>ERD1<br>PSD1<br>PSD2<br>TID1<br>TID2<br>RSD1 | Paint shop Sanding (all stations)                     | Dry Filter  | N/A   |
| BS1  | Welding and Bonding (Arc Welding Only)                | Filter      | N/A   |

\* Clearcoat booth (CFD1/CFD2/CFD3) exhaust is routed to the zeolite rotary concentrators after filtration.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 3.2.2 The Permittee shall ensure that VOC emissions from the following operations shall be captured and controlled by the RTO.  
[40 CFR 52.21(j)(2) – VOC BACT]

| Unit ID          | Unit Description                            |
|------------------|---|
| EOV1, EOVS2      | E-coat Ovens (2)                            |
| UOV1             | Underbody Sealer Oven                       |
| POV1, POV2       | Guide coat (Primer) Ovens (2)               |
| FA1, FA2, FA3    | Topcoat Basecoat Flashoff areas (3)         |
| CFD1, CFD2, CFD3 | Topcoat Clearcoat Spray Booth Concentrators |
| TOV1, TOV2, TOV3 | Topcoat Ovens (3)                           |

VOC emissions from the Topcoat Clearcoat Spray Booths (CFD1/CFD2/CFD3) shall be captured and controlled by the rotary concentrators.

- 3.2.3 The Permittee shall not discharge or cause the discharge into the atmosphere from the electrodeposition prime coat (E-Coat) operations (Emission Units EDT1/EOV1 and EDT2/EOV2), VOC emissions in excess of 0.10 pounds per gallon of applied coating solids (lbs VOC/GACS) as averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.4 The Permittee shall not discharge or cause the discharge into the atmosphere from guide coat (primer surfacer) operations (Emission Units PSB1, PSB2, POV1, POV2), VOC emissions in excess of 2.78 pounds per gallon of applied coating solids as averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.5 The Permittee shall not discharge or cause the discharge into the atmosphere from topcoat (basecoat/clearcoat) operations (Emission Units BSB1, BSB2, BSB3, FA1, FA2, FA3, CFD1, CFD2, CFD3, TOV1, TOV2, TOV3), VOC emissions in excess of 2.49 pounds per gallon of applied coating solids as averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.6 The Permittee shall not use or apply sealers, sound deadeners or other material in the inner sealer and UBS operations (Emission Units SD1, SD2, UBS1, UBS2, and UOV1) that have a monthly weight average VOC content in excess of 0.4 pounds per gallon as applied, averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.7 The Permittee shall not use or apply cavity wax that has a VOC content in excess of 0.3 pounds per gallon as applied, averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 3.2.8 The Permittee shall not use or apply underbody wax that has a VOC content in excess of 0.3 pounds per gallon weighted average as applied, averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.9 The Permittee shall not use or apply windshield primer and adhesives that have a monthly weighted average VOC content in excess of 0.3 pounds per gallon weighted average as applied, averaged on a monthly basis.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.10 The Permittee shall comply with Georgia Rule (t) as BACT for touchup coatings.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.11 The Permittee shall not discharge or cause the discharge into the atmosphere from body wiping, strippable paint booth coatings, and equipment cleaning processes at this plant, combined VOC emissions in excess of 90 tons during any twelve consecutive months. This limit does not include paint gun purge cleaning, production or touchup coating, or windshield cleaner-activator.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.12 The Permittee shall not cause, let, suffer, permit, or allow emissions of NO<sub>x</sub>, from any natural gas-fired external combustion source (including boilers, direct-fired air supply houses (ASH), indirect-fired ovens, and rooftop air makeup units), excluding the RTO, to exceed 35 ppm @3% O<sub>2</sub>. The Permittee shall not cause, let, suffer, permit, or allow emissions of NO<sub>x</sub> from the RTO to exceed 60 ppm @3% O<sub>2</sub>. No fuels other than natural gas shall be burned in these units.  
[40 CFR 52.21(j)(2) – NO<sub>x</sub> BACT]
- 3.2.13 The Permittee shall not cause, let, suffer, permit, or allow emissions of total greenhouse gases (Total GHG), from all the natural gas-fired external combustion sources combined to exceed 118 lb CO<sub>2</sub>e/MMBtu heat input. No fuels other than natural gas shall be burned in these units.  
[40 CFR 52.21(j)(2) – Total GHG BACT]
- 3.2.14 The Permittee shall not cause, let, suffer, permit, or allow emissions of Total GHG, from diesel -fired emergency generators and fire pump combined to exceed 164 lb CO<sub>2</sub>e /MMBtu heat input. No fuels other than ultra low sulfur diesel shall be burned in these units.  
[40 CFR 52.21(j)(2) – Total GHG BACT]
- 3.2.15 The Permittee shall not operate the Transys foam manufacturing operation unless the dust collector is in operation. The dust collector shall not emit PM in excess of 0.004 gr/dscf.  
[40 CFR 52.21(j)(2) – PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

Best Available Control Technology – Work Practice Requirements – 52.21

- 3.2.16 All the operating limits and/or work practice requirements as specified in Conditions 3.3.7, 3.3.8, 3.3.9, 3.4.7, and 3.4.8 have been deemed as BACT for the VOC emissions from the same affected sources. Consequently, compliance with these operating limits, procedures and/or requirements for the VOC/HAP emissions is considered as compliance with the BACT requirements for the VOC emissions from the same affected sources.  
[40 CFR 52.21(j)(2) – VOC BACT]
- 3.2.17 The Permittee shall comply with NSPS 40 CFR 60 Subpart IIII for all emergency generators and fire pumps as BACT for such units.  
[40 CFR 52.21(j)(2) – NO<sub>x</sub>, CO, VOC, and PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]
- 3.2.18 The Permittee may not transfer or cause or allow the transfer of windshield wiper fluid (MeOH max. true vapor pressure = 2.19 psia) from any delivery vessel into any stationary storage tank greater than 4,000 gallons unless the tank is equipped with submerged fill pipe(s).  
[40 CFR 52.21(j)(2)– VOC BACT]
- 3.2.19 The Permittee shall design the cooling towers to have a drift rate of no greater than 0.0005%.  
[40 CFR 52.21(j)(2) – PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]
- 3.2.20 The Permittee shall maintain the paved roads to minimize fugitive dust, and comply with Georgia Rule (n) as BACT for the paved roads.  
[40 CFR 52.21(j)(2) – PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]
- 3.2.21 The Permittee shall comply with 40 CFR 63 Subpart DDDDD for all applicable units (boilers, and indirect ovens) as BACT for such units. The permittee shall operate all direct-fired units including ASH and rooftop air makeup units in a manner consistent with good operational practices, including conducting periodic maintenance and only firing pipeline-quality natural gas.  
[40 CFR 52.21(j)(2) – NO<sub>x</sub>, CO, VOC, and PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]

**3.3 Equipment Federal Rule Standards**

40 CFR 63 Subpart IIII: NESHAP: Surface Coating of Automobiles and Light-Duty Trucks

- 3.3.1 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – “General Provisions,” and Subpart IIII – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks,” for operation of all of the surface coating operations (Emission Units EDT1, EDT2, PSB1, PSB2, BSB1, BSB2, BSB3, CFD1, CFD2, CFD3, SD1, SD2, UBS1, UBS2, CWD1, CWD2, RB01, AWG1, APB1, BS1, VPTU, and VPBW).  
[40 CFR 63 Subpart A and Subpart IIII]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 3.3.2 The Permittee shall limit, as a single group, combined organic HAP emissions to the atmosphere from the electrodeposition prime coat (E-Coat) operations, guide coat (primer surfacer), topcoat, final repair, glass bonding primer and glass bonding adhesive operations plus all coatings and thinners (excluding deadener materials and for adhesive and sealer materials that are not components of glass bonding systems) used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), to no more than 0.036 kilogram (kg)/liter (0.30 pound (lb)/gallon) of coating solids deposited during each month, determined according to Conditions 6.2.29 and/or 6.2.30 per 40 CFR 63.3161.

As an alternative to the limit above, the Permittee may comply with the HAP limit of 0.060 kg/liter (0.5 pound /gallon) of coating solids deposited from guide coat (primer surfacer), topcoat, final repair, glass bonding primer and glass bonding adhesive operations plus all coatings and thinners (excluding deadener materials and for adhesive and sealer materials that are not components of glass bonding systems), provided that emissions from the E-coat oven are captured and controlled (reduced) by 95 percent, or that coatings used in the E-coat process contain no more than 1.0 percent HAP (0.1 percent for any HAP carcinogen) [40 CFR 63.3082(b), (c), and (d); 63.3090(a) and (b); and 63.3092(a) and (b)]

For the purpose of this condition, an affected source is the collection of all the items listed below, as used for surface coating of new automobile or new light-duty truck bodies, or body parts for new automobiles or new light-duty trucks:

- a. All coating operations as defined in 40 CFR 63.3176.
- b. All storage containers and mixing vessels for coatings, thinners, and cleaning materials.
- c. All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials.
- d. All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- e. Any additional coating operations, as defined in 40 CFR 63.3176, chosen by the Permittee to include in the affected source hereby instead of being subject to the NESHAP for surface coating of miscellaneous metal parts and products (40 CFR 63, Subpart Mmmm) or for surface coating of plastic parts and products (40 CFR 63, Subpart Pppp) which apply coatings to parts intended for use in new automobiles or new light-duty trucks or as aftermarket repair or replacement parts for automobiles or light-duty trucks. Such additional coating operations shall also include:
  - i. All associated storage containers and mixing vessels used for storing or mixing coatings, thinners, and cleaning materials; manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and storage containers and manual and automated equipment and containers used for conveying waste materials.



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- ii. All cleaning and purging of equipment associated with the added surface coating operations.

The Permittee shall identify and describe all additions to the affected source made pursuant to paragraph (e) of this condition in the initial notification required in Condition 6.2.10 per 40 CFR 63.3110(b).

- 3.3.3 The Permittee shall limit average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems to no more than 0.010 kg/kg (lb/lb) of the adhesive and sealer material used during each month. Adhesives and sealers that are not components of glass bonding systems and added per 40 CFR 63.3082(c) to the affected source specified in Condition 3.3.2 shall be included in the demonstration of this limit.  
[40 CFR 63.3090(c) and 63.3090(e)(1)]
- 3.3.4 The Permittee shall limit average organic HAP emissions from all deadener materials to no more than 0.010 kg/kg (lb/lb) of the deadener material used during each month. Deadener materials added per 40 CFR 63.3082(c) to the affected source specified in Condition 3.3.2 shall be included in the demonstration of this limit.  
[40 CFR 63.3090(d) and 63.3090(e)(2)]
- 3.3.5 The Permittee shall meet the operating limits applicable to the regenerative thermal oxidizer (RTO) and the associated capture systems by controlling the organic HAP emissions from the affected source as defined in Condition 3.3.2. The Permittee shall establish the operating limits during the most recent performance tests per 40 CFR 63.3167. The Permittee shall meet these operating limits at all times during coating operations on and after the establishment of these limits.  
[40 CFR 63.3093(b) and (c); 63.3167(a); and Items 1, 6 and 7 of Table 1 to 40 CFR 63 Subpart III]
  - a. The average combustion temperature of the RTO in any 3-hour block period shall not fall below that established during the most recent Division-approved performance test, as monitored per Condition 5.2.1. Until the initial performance test is conducted, the minimum temperature shall be 1400°F.
  - b. For each associated capture system that is a permanent total enclosure (PTE):
    - i. The air flow at all times shall flow into the enclosure; and either
    - ii. The average facial velocity of air through all natural draft openings in the enclosure shall be at least 200 feet per minute; or
    - iii. The pressure drop across the enclosure shall be at least 0.007 inch water column.
  - c. For each associated capture system that is not a PTE, the average gas volumetric flow rate or duct static pressure in each duct between a capture device and the RTO inlet in any 3-hour block period shall not fall below the average volumetric flow rate or duct

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

static pressure established for that capture device during the most recent Division-approved performance test.

- 3.3.6 The Permittee shall meet the operating limits applicable to the rotary concentrators and the associated capture systems by controlling the organic HAP emissions from the affected source as defined in Condition 3.3.2. The Permittee shall establish the operating limits during the most recent performance tests per 40 CFR 63.3167. The Permittee shall meet these operating limits at all times during coating operations on and after the establishment of these limits.

[40 CFR 63.3093(b) and (c); 63.3167(e); and Items 5 and 6 of Table 1 to 40 CFR 63 Subpart III]

- a. The minimum operating limit for the concentrators is 8 degrees Celsius (15 degrees Fahrenheit) below the average desorption gas inlet temperature maintained during the performance test for that concentrator. The Permittee shall keep the set point for the desorption gas inlet temperature no lower than 6 degrees Celsius (10 degrees Fahrenheit) below the lower of that set point during the performance test for that concentrator and the average desorption gas inlet temperature maintained during the performance test for that concentrator.
- b. For each associated capture system that is a permanent total enclosure (PTE):
  - i. The air flow at all times shall flow into the enclosure; and either
  - ii. The average facial velocity of air through all natural draft openings in the enclosure shall be at least 200 feet per minute; or
  - iii. The pressure drop across the enclosure shall be at least 0.007 inch water column.

- 3.3.7 The Permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations subject to the applicable HAP emission limits in Conditions 3.3.2, 3.3.3 and 3.3.4 per 40 CFR 63.3090(a) through (d). The plan shall specify practices and procedures to ensure that, at a minimum, the elements specified below are implemented.

[40 CFR 63.3094(b)]

- a. Store all organic-HAP-containing coatings, thinners, cleaning materials, and waste materials in closed containers.
- b. Minimize the risk of spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials.
- c. Convey organic-HAP-containing coatings, thinners, cleaning materials, and waste materials from one location to another in closed containers or pipes.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- d. Close mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials when adding to, removing, or mixing the contents.
- e. Minimize organic HAP emissions during cleaning of storage, mixing, and conveying equipment.

3.3.8 The Permittee shall develop and implement a work practice plan to minimize organic HAP emissions from cleaning and from equipment purging associated with all coating operations subject to the emission limit in Conditions 3.3.2, 3.3.3 and 3.3.4 per 40 CFR 63.3090(a) through (d). The plan shall, at a minimum, address each of the operations listed below for the use of organic-HAP-containing materials or in which there is a potential for emission of organic HAP.

[40 CFR 63.3094(c)]

- a. For vehicle body wipe emissions, using one or more of the techniques listed below or an approved alternative:
  - i. Use of solvent-moistened wipes;
  - ii. Keeping solvent containers closed when not in use;
  - iii. Keeping wipe disposal/recovery containers closed when not in use;
  - iv. Use of tack-wipes; and/or
  - v. Use of solvents containing less than 1 percent organic HAP by weight.
- b. For coating line purging emissions, using one or more of the techniques listed below or an approved alternative:
  - i. Air/solvent push-out;
  - ii. Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips);
  - iii. Block painting to the maximum extent feasible; and/or
  - iv. Use of low-HAP or no-HAP solvents for purge.
- c. For flushing of coating systems, using one or more of the techniques listed below, or an approved alternative.
  - i. Keeping solvent tanks closed;
  - ii. Recovering and recycling solvents;
  - iii. Keeping recovered/recycled solvent tanks closed; and/or
  - iv. Use of low-HAP or no-HAP solvents.
- d. For cleaning of spray booth grates, using one or more of the techniques listed below or an approved alternative.
  - i. Controlled burn-off;
  - ii. Rinsing with high-pressure water (in place);

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- iii. Rinsing with high-pressure water (off line);
  - iv. Use of spray-on masking or other type of liquid masking; and/or
  - v. Use of low-HAP or no-HAP content cleaners.
- e. For cleaning of spray booth walls, using one or more of the techniques listed below, or an approved alternative.
- i. Use of masking materials (contact paper, plastic sheet, or other similar type of material);
  - ii. Use of spray-on masking;
  - iii. Use of rags and manual wipes instead of spray application when cleaning walls;
  - iv. Use of low-HAP or no-HAP content cleaners; and/or
  - v. Controlled access to cleaning solvents.
- f. For cleaning of spray booth equipment, using one or more of the techniques listed below, or an approved alternative.
- i. Use of covers on equipment (disposable or reusable);
  - ii. Use of parts cleaners (off-line submersion cleaning);
  - iii. Use of spray-on masking or other protective coatings;
  - iv. Use of low-HAP or no-HAP content cleaners; and/or
  - v. Controlled access to cleaning solvents.
- g. For cleaning of external spray booth areas, using one or more of the techniques listed below, or an approved alternative.
- i. Use of removable floor coverings (paper, foil, plastic, or similar type of material);
  - ii. Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application;
  - iii. Use of shoe cleaners to eliminate coating track-out from spray booths;
  - iv. Use of booties or shoe wraps;
  - v. Use of low-HAP or no-HAP content cleaners; and/or
  - vi. Controlled access to cleaning solvents.
- h. For emissions from housekeeping measures not aforementioned, using one or more of the techniques listed below, or an approved alternative.
- i. Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use;
  - ii. Storing new and used solvents in closed containers; and/or
  - iii. Transferring of solvents in a manner to minimize the risk of spills.

Notwithstanding the requirements aforementioned, if the type of coatings used in any surface coating operations subject to the requirements of this condition are of such a nature that the need for one or more of the practices aforementioned is eliminated, then the plan may include

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

approved alternative or equivalent measures that are applicable or necessary during cleaning of storage, conveying, and application equipment.

- 3.3.9 As provided in 40 CFR 63.6(g), the Division may grant the Permittee permission to use an alternative to the work practice standards in Conditions 3.3.7 and 3.3.8. The work practice plans developed in accordance with Conditions 3.3.7, 3.3.8 and this condition shall be deemed as part of the BACT for VOC emissions from the affected source and/or other operations/source. Copies of the work practice plans, as well as plans developed within the preceding 5 years if applicable, shall be available onsite for inspection and copying by the permitting authority.  
[40 CFR 63.3094(d) through (f)]

40 CFR 60 Subpart MM: *NESHAP for Automobile & Light Duty Truck Surface Coating Operations*

- 3.3.10 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 60 Subpart A – “General Provisions,” and Subpart MM – “Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations” for the operation of the prime coat operation (Emission Unit EDT1, EDT2, EOVI, and EOVI2), guide coat operation (Emission Unit PSB1, PSB2, POVI, and POVI2), and topcoat operation (Emission Unit BSB1, BSB2, BSB3, FA1, FA2, FA3, CFD1, CFD2, CFD3, TOVI, TOVI2, and TOVI3).  
[40 CFR 60 Subpart A and Subpart MM]
- 3.3.11 The Permittee shall not discharge or cause the discharge into the atmosphere from the e-coat operation VOC emissions in excess of 0.17 kilogram of VOC per liter (1.4 lbs VOC/gallon) of applied coating solids (monthly average). Compliance with Condition 3.2.3 indicates compliance with this limit.  
[40 CFR 60.392(a)]
- 3.3.12 The Permittee shall limit the emissions of VOC from the guide coat (surfacers) to no more than 1.40 kilograms of VOC per liter (11.7 lbs VOC/gallon) of applied coating solids (monthly average). The guide coat operation consists of guide coat booths (2) and ovens (2). Compliance with Condition 3.2.4 indicates compliance with this limit.  
[40 CFR 60.392(b)]
- 3.3.13 The Permittee shall limit the emissions of VOC from the topcoat operations consisting of basecoat booths (3), flashoff areas (3), clearcoat booths (3), and clearcoat curing ovens (3) to no more than 1.47 kilograms of VOC per liter (12.2 lbs VOC/gallon) of applied coating solids (monthly average). Compliance with Condition 3.2.5 indicates compliance with this limit.  
[40 CFR 60.392(c)]

40 CFR 63 Subpart DDDDD: *NESHAP for Industrial, Commercial & Institutional Boilers & Process Heaters*

- 3.3.14 The Permittee shall comply with all applicable provisions, not otherwise specifically addressed under another condition in this permit, of 40 CFR 63, Subpart DDDDD “National

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters” and the applicable provisions of 40 CFR 63, Subpart A “General Provisions” as described in Subpart DDDDD for Boilers BO01 through BO06, and indirect ovens, which are defined as process heaters under Boiler MACT [40 CFR 63 Subparts A and DDDDD]

- 3.3.15 The Permittee shall conduct tune-ups for each subject boiler and process heater according to the schedule below to demonstrate continuous compliance as specified in paragraphs a. through e. of this condition. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up, and each annual tune-up must be conducted no more than 13 months after the previous tune-up.  
 [40 CFR 63.7500(a)(1); 63.7505(a); 63.7515(d); 63.7540(a)(10) and (11); and Items 2. and 3. of Table 3 to 40 CFR 63 Subpart DDDDD]

**Boiler MACT Boilers and Process Heaters (Gas 1)**

| Source                          | Heat Input Capacity<br>(mmbtu/hr) | Tune Up<br>Frequency |
|---------------------------------|-----------------------------------|----------------------|
| Units <5MMBTU/hr                |                                   |                      |
| None                            | N/A                               | every 5 years        |
| Units > 5MMBTu/hr, < 10MMBTu/hr |                                   |                      |
| Boilers 1-6                     | 8.30                              | Biennial             |
| Units > 10MMBTu/hr              |                                   |                      |
| ED Oven #1                      | 20                                | Annual               |
| ED Oven #2                      | 13.34                             | Annual               |
| UBS Oven                        | 17                                | Annual               |
| Guide coat Oven #1              | 17                                | Annual               |
| Guide coat Oven #2              | 17                                | Annual               |
| Topcoat Oven #1                 | 17                                | Annual               |
| Topcoat Oven #2                 | 17                                | Annual               |
| Topcoat Oven #3                 | 17                                | Annual               |

- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
  - e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
  - f. Maintain on-site and submit, if requested by the Division, an annual report containing the information in paragraphs f.i. through f.iii. below,
    - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
    - ii. A description of any corrective actions taken as a part of the tune-up; and
    - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

40 CFR 63 Subpart EEEE: NESHAP for Organic Liquids Distribution

- 3.3.16 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart EEEE "National Emission Standards for Hazardous Air Pollutants for Major Sources: Organic Liquids Distribution, and Subpart A "General Provisions" as described in Subpart EEEE for stationary tanks storing a liquid HAP subject to this requirement.  
[40 CFR 63 Subpart A and Subpart EEEE]

40 CFR 60 Subpart IIII: NSPS for Stationary Compression Ignition Internal Combustion Engines

- 3.3.17 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines," for operation of the emergency generators and fire pumps. Compliance with IIII is compliance with 40 CFR 63 ZZZZ for units equal or less than 500bhp.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

[40 CFR 60 Subpart A; 40 CFR 60 Subpart IIII; 40 CFR 63 Subpart ZZZZ; and 40 CFR 63.6590(c)(6)]

- 3.3.18 The Permittee shall only use diesel fuel that has a maximum sulfur content of 15 ppm (0.0015 percent by weight) and either a minimum cetane index of 40 or maximum aromatic content of 35 volume percent for the emergency generators and fire pumps subject to 40 CFR 60 Subpart IIII.  
[40 CFR 60.4207(b) and 40 CFR 1090.305(b) and (c)]
- 3.3.19 The accumulated non-emergency service (maintenance check and readiness testing) time for the emergency generators subject to 40 CFR 60 Subpart IIII shall not exceed 100 hours per year. Any operation other than emergency operation, maintenance check and readiness testing is prohibited.  
[40 CFR 60.4211(f)]
- 3.3.20 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each emergency generator onsite, any gases which contain in excess of the associated emission standards specified in 40 CFR 1039.  
[40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), and 40 CFR 1039]
- 3.3.21 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each emergency generator onsite, any gases which contain visible emissions with an opacity exceeding:  
[40 CFR 60.4205(b), 40 CFR 60.4202(a)(2), and 40 CFR 1039.105]
- a. 20 percent during the acceleration mode.
  - b. 15 percent during the lugging mode.
  - c. 50 percent during the peaks in either the acceleration or lugging modes.
- 3.3.22 The Permittee shall comply with the emission standards specified in Table 4 to 40 CFR 60 Subpart IIII for each fire pumps onsite.  
[40 CFR 60.4205(c) and Table 4 to 40 CFR 60 Subpart IIII]



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

40 CFR 63 Subpart III: NESHAP for Flexible Polyurethane Foam

3.3.23 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart III “National Emission Standards for Hazardous Air Pollutants for Major Sources: Flexible Polyurethane Foam, and Subpart A “General Provisions” as described in Subpart III for molded foam production operations subject to this requirement. Specifically, the Permittee shall comply with both of the following:

[40 CFR 63 Subpart A; Subpart III; and 40 CFR 63.1300]

- a. A HAP or HAP-based material shall not be used as an equipment cleaner to flush the mixhead, nor shall it be used elsewhere as an equipment cleaner in a molded flexible polyurethane foam process, with the following exception. Diisocyanates may be used to flush the mixhead and associated piping during periods of startup or maintenance, provided that the diisocyanate compounds are contained in a closed-loop system and are re-used in production.
- b. A HAP-based mold release agent shall not be used in a molded flexible polyurethane foam source process.

**3.4 Equipment SIP Rule Standards**

Georgia Rule 391-3-1-.02(2)(b): Visible Emissions

3.4.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from any source listed in Table 3.1 as subject to Rule (b), any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.

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

Georgia Rule 391-3-1-.02(2)(d): Fuel Burning Equipment

3.4.2 The Permittee shall not cause, let, suffer, permit, or allow any emissions from any source listed in Table 3.1 as subject to Rule (d) which:

- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per million BTU heat input [for equipment with a rated capacity of less than 10 million BTU heat input per hour (MMBtu/hr)].

[391-3-1-.02(2)(d)2.(i)]

- b. Contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from  $P = 0.5(10/R)^{0.5}$  where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU [for equipment with a rated capacity equal to or greater than 10 MMBtu/hr and equal to or less than 250 MMBtu/hr].

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

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- c. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity.  
[391-3-1-.02(2)(d)3.]

Georgia Rule 391-3-1-.02(2)(e): *Particulate Emissions from Manufacturing Processes*

- 3.4.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source listed in Table 3.1 as subject to Rule (e), particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.  
[391-3-1-.02(2)(e)1.]

- a. For equipment in operation or extensively altered **after** July 2, 1968:
- i.  $E = 4.1P^{0.67}$ , for process input weight rate up to and including 30 tons per hour;
  - ii.  $E = 55P^{0.11} - 40$ , for process input weight rate in excess of 30 tons per hour.

Where:

E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

Georgia Rule 391-3-1-.02(2)(g): *Sulfur Dioxide*

- 3.4.4 The Permittee shall burn only natural gas in all external combustion sources, and shall only burn ultra-low sulfur diesel in internal combustion sources, unless otherwise specified.  
[391-3-1-.03(2)(c); 391-3-1-.02(2)(g) (subsumed); 40 CFR 52.21(j)(2) – NO<sub>x</sub>, CO, VOC, and PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT]

Georgia Rule 391-3-1-.02(2)(t): *VOC Emissions from Surface Coating of Automobiles & Light-Duty Trucks*

- 3.4.5 The Permittee shall not cause, let, permit, suffer or allow the emissions of VOC from this facility to exceed:
- a. 1.2 pounds of VOC per gallon of coating excluding water, as a monthly weighted average, from each electrophoretic (E-coat) applied prime operation;
  - b. 15.1 pounds of VOC per gallon of applied coating solids, as a daily weighted average, from each spray prime operation (includes surfacer)
  - c. 15.1 pounds of VOC per gallon of applied coating solids, as a daily weighted average, from each topcoat operation;
  - d. 4.8 pounds of VOC per gallon of coating delivered to the coating applicator from each final repair operation. If any coating delivered to the coating applicator

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

contains more than 4.8 pounds of VOC per gallon of coating, the limit shall be 13.8 pounds of VOC per gallon of coating solids sprayed, as a daily weighted average.

- e. 3.5 pounds of VOC per gallon of sealer, excluding water, delivered to an applicator that applies sealers in amounts less than 25,000 gallons during a 12 consecutive month period;
- f. 1.0 pound of VOC per gallon of sealer, excluding water, delivered to a coating applicator that applies sealers in amounts greater than 25,000 gallons during a 12 consecutive month period;
- g. 3.5 pounds of VOC per gallon of adhesive, excluding water, delivered to an applicator that applies adhesives, except body glass adhesives;
- h. 6.9 pounds of VOC per gallon of cleaner, excluding water, delivered to an applicator that applies cleaner to the edge of body glass prior to priming;
- i. 5.5 pounds of VOC per gallon of primer, excluding water, delivered to an applicator that applies primer to the body glass or to the body to prepare the glass and body for bonding;
- j. 1.0 pound of VOC per gallon of adhesive, excluding water, delivered to an applicator that applies adhesive to bond body glass to the body; and
- k. 3.5 pounds of VOC per gallon of material, excluding water, for all other materials not subject to some other emission limitation stated in this paragraph.

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

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

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

[391-3-1-.02(2)(t)4.]

- 3.4.7 The Permittee shall not cause, let, permit, suffer or allow the emission of VOC from solvents used to purge, flush or clean paint application systems including paint lines, tanks and applicators, unless such solvents are captured to the maximum degree feasible by being directed into containers that prevent evaporation into the atmosphere.

[391-3-1-.02(2)(t)5.]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 3.4.8 The Permittee shall not store solvents or waste solvents in drums, pails, cans or other containers unless such containers have air-tight covers which are in place at all times when materials are not being transferred into or out of the container. The solvents or waste solvents shall not be disposed of or transferred by any method, which allows the excessive evaporation of the solvent(s) into the atmosphere.  
[391-3-1-.02(2)(t)6.]
- 3.4.9 The Permittee shall not cause, let, permit, suffer or allow the emissions of VOC from the cleaning of oil and grease stains on the body shop floor to exceed 0.1 pounds per unit of production.  
[391-3-1-.02(2)(t)7.]
- 3.4.10 The Permittee shall, during all periods of the operation of any coating line(s) in which the RTO VOC reduction credit is needed to comply with any applicable emission limit(s) in this subsection, operate the RTO and associated emission capture system(s) serving the coating line(s) in accordance with Condition 3.3.5.  
[391-3-1-.02(2)(t)3. and 391-3-1-.02(2)(a)10.]
- 3.4.11 The Permittee shall, during all periods of the operation of the topcoat line, if the rotary concentrator VOC reduction credit is needed to comply with any applicable emission limit(s) in this subsection, operate the rotary concentrators and associated emission capture system(s) serving the coating line(s) in accordance with Condition 3.3.6.  
[391-3-1-.02(2)(t)3. and 391-3-1-.02(2)(a)10.]

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

None Applicable.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**PART 4.0 REQUIREMENTS FOR TESTING**

**4.1 General Testing Requirements**

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.  
[391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.  
[391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
- a. Method 1 or 1A for the determination of sample point locations;
  - b. Method 2, 2A, 2C, 2D, 2F, or 2G for the determination of flow rate;
  - c. Method 3, 3A, or 3B for the determination of stack gas molecular weight;
  - d. Method 4 for the determination of stack gas moisture;
  - e. Method 5 for the determination of PM emissions;
  - f. Method 7 or 7E for the determination of NO<sub>x</sub> emissions;
  - g. Method 9 and the procedures contained in Section 1.3 of the above reference document for the determination of opacity;
  - h. Method 10, 10A or 10B for the determination of CO emissions (using ASTM D6522-00 when natural gas is the fuel)
  - i. Method 24 for the determination of the volatile matter content, water content, density, volume solids, and weight solids of surface coatings;
  - j. Method 25 for the determination of total gaseous nonmethane organic emissions as carbon or Method 25A for the determination of total gaseous organic concentration using a flame ionization analyzer;

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- k. Method 204 for criteria for and verification of a permanent or temporary total enclosure.
- l. Method 300 for the determination of surface coating transfer efficiency.
- m. Method 311 for the determination of HAP content of surface coatings, solvents and other VOC materials.
- n. ASTM Method D2697–86, “*Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings*” (ref. 40 CFR 63.14), or ASTM Method D6093–97, “*Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer*” to determine the volume fraction of coating solids for each coating.
- o. ASTM Method D5066–91 (Re-approved 2001), “*Standard Test Method for Determination of the Transfer Efficiency Under Production Conditions for Spray Application of Automotive Paints-Weight Basis*” or the guidelines presented in “*Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations*,” EPA-450/3-88-018. In determining compliance with the emission limits in Section 2.112 of the above referenced document and Condition 3.4., the Permittee shall follow the applicable procedures in EPA-450/3-88-018: *Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations*.
- p. ASTM Method D1475–98, “*Standard Test Method for Density of Liquid Coatings, Inks, and Related Products*”, or test method A or test method B of ASTM Method D5965-02, “*Standard Test Methods for Specific Gravity of Coating Powders*” for the determination of density of coatings

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)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.

[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

- 4.1.5. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

## **4.2 Specific Testing Requirements**

### 40 CFR Part 63, Subpart IIII Testing Requirements

4.2.1 Within 180 days of the initial startup of the affected sources in Condition 3.3.1, the Permittee shall conduct a performance test of each emission capture system and add-on emission control device involved according to the applicable requirements in 40 CFR 63.7(e)(1) and 63.3164 through 40 CFR 63.3166. The performance test shall demonstrate compliance with applicable emission limits, and establish the operating limits required by Condition 3.3.5 and 3.3.6 per 40 CFR 63.3093. The Permittee shall meet the following requirements during the performance test:

[40 CFR 63.3160(a) and 63.3164 through 63.3167]

- a. All emission capture systems, add-on control devices, and continuous parameter monitoring system (CPMS) involved shall be installed and operating no later than the applicable compliance date.
- b. The performance test shall be conducted under representative operating conditions for the coating operation(s) involved. Coating operations during periods of startup, shutdown, or malfunction, and during periods of non-operation do not constitute representative conditions for the purposes of testing. The Permittee shall record the process information that is necessary to document operating conditions during the test(s) and explain why the conditions represent normal operation.
- c. The performance test(s) shall be conducted when the emission capture system(s) and add-on control device(s) involved are operating at a representative flow rate, and the add-on control device(s) is operating at a representative inlet concentration. The Permittee shall record information that is necessary to document emission capture system(s) and add-on control device(s) operating conditions during the test(s) and explain why the conditions represent normal operation.
- d. The Permittee shall use the applicable presumptions, procedures and test methods specified in 40 CFR 63.3165 to determine the capture efficiency of each emission capture system involved and the corresponding operating limits/parameters of the system per 40 CFR 63.3165.
- e. The Permittee shall use the applicable procedures and test methods specified in 40 CFR 63.3166 to determine the emission destruction or removal efficiency of each emission add-on control device and the corresponding operating limits/parameters of the control device per 40 CFR 63.3167. The Permittee shall conduct three test runs as specified in 40 CFR 63.7(e)(3), and each test run must last at least one (1) hour.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- f. For the rotary concentrators, the Permittee must measure emissions at both the outlet of the RTO and the outlet of the concentrators per 63.3166(c).
- 4.2.2 Pursuant to Condition 4.2.1, the Permittee shall conduct performance testing to determine the VOC destruction efficiency of the regenerative thermal oxidizer (RTO). The Permittee shall conduct subsequent performance tests on the regenerative thermal oxidizer (RTO) to determine the VOC destruction efficiency within 180 days after the startup of the facility expansion (second E-coat line and third topcoat line) and then at a frequency of at least once every 60 months following the most recent performance test. During the test(s), the combustion chamber temperature shall be continuously monitored and recorded using the equipment required in Condition 5.2.1, and the records submitted along with test results, and document the average temperature (which will be used to set the operating limit).  
[40 CFR 63.3167 and 391-3-1-.02(3)(a)]
- 4.2.3 Pursuant to Condition 4.2.1, the Permittee shall conduct performance testing to determine the VOC removal efficiency of the rotary concentrators. The Permittee shall conduct performance tests on the rotary concentrators to determine the VOC destruction efficiency at a frequency of at least once every 60 months following the most recent performance test. During the test(s), the desorption gas inlet temperature shall be continuously monitored and recorded using the equipment required in Condition 5.2.2, and the records submitted along with test results, and document the average temperature (which will be sued to set the operating limit).  
[40 CFR 63.3167 and 391-3-1-.02(3)(a)]
- 4.2.4 Pursuant to Condition 4.2.1, the Permittee shall conduct performance testing to determine the capture efficiency of each capture system exhausting to RTO or the rotary concentrators. Capture efficiency testing shall be conducted in accordance with the procedures specified in 40 CFR 63.3165. The Permittee shall conduct performance tests to determine the capture efficiency of each capture system exhausting to RTO or the rotary concentrators at a frequency of at least once every 60 months following the most recent performance test. During the test(s), the Permittee shall monitor and record either the gas volumetric flow rate or duct static pressure in each individual capture system prior to merging (manifolding) of ductwork using the devices required in Condition 5.2.3 and submit the records along with the test results.

The capture efficiency testing shall, at a minimum, sufficiently determine the portion of VOC applied in a coating application area that is captured (either from within the application area or from the curing oven) and routed to the RTO or rotary concentrators, (such as the portion of VOC used in the E-Coat tank that is captured in the E-Coat oven). Furthermore, the capture testing plan shall address VOC from adhesive bonding, sealers, and deadeners that are expected to be released in the E-coat oven and UBS cure oven.  
[391-3-1-.02(3)(a)]



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 4.2.5 Within 180 days of the initial startup of the affected sources in Condition 3.3.2, the Permittee shall determine the transfer efficiency of the surface coating spray operations in accordance with 40 CFR 63.3161(g). Such a determination shall be made on each paint spray booth subject to 40 CFR 63 Subpart IIII or 40 CFR 60 Subpart MM, including, but not limited to the sources listed below, unless an alternative determination as allowed by 40 CFR 63 IIII is approved by the Division.

| <b>Spray Booth</b>                              | <b>Unit ID</b>   |
|---|------------------|
| UBS (2)   | UBS1, UBS2       |
| Primer (Guide coat) (2)                         | PSB1, PSB2       |
| Topcoat Basecoat (3)                            | BSB1, BSB2, BSB3 |
| Topcoat Clear coat (3)                          | CFD1, CFD2, CFD3 |
| Paint Shop Touchup (at least 1 of the six)      | RB01             |
| Assembly Shop Touchup (at least 1 of the eight) | APB1             |
| Cavity Wax (at least 1 of the two)              | CWD1, CWD2       |
| VPC underbody wax                               | VPBW             |
| VPC final touchup                               | VPTU             |

Other Testing Requirements

- 4.2.6 Within 180 days of the initial startup of vehicle production, the Permittee shall conduct a performance test on one representative boiler to determine emissions of nitrogen oxides (NO<sub>x</sub>) and demonstrate initial compliance with Condition 3.2.12 for all natural gas-fired combustion units at the facility. In lieu of testing additional units or conducting subsequent testing, the Permittee shall maintain documentation from the unit vendor of the specified NO<sub>x</sub> emissions for each class of unit.  
[391-3-1-.02(3)(a)]
- 4.2.7 Within 180 days of the initial startup of vehicle production, the Permittee shall conduct filterable particulate matter performance tests on the Guide coat Booth #1 stack and a touchup booth stack to demonstrate compliance with BACT Condition 3.2.1. This test shall serve as representative for all spray booths that use similar filter media. During the tests, the Permittee shall measure and record the pressure drop across the filter at least once per 15 minutes, and submit the records (and established average pressure) along with the test results. In lieu of testing additional booths, the Permittee shall maintain documentation from the filter vendor that specifies grain loading, and documentation that all filters in Guide coat and Basecoat and Clearcoat are at least as efficient as the booth filter tested.  
[391-3-1-.02(3)(a)]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 4.2.8 Within 180 days of the initial startup of vehicle production, the Permittee shall conduct a filterable particulate matter performance test on at least one of the Paint Shop Touchup booths. In lieu of testing additional booths, the Permittee shall maintain documentation from the filter vendor that specifies efficiency, and documentation that all booths (including but not limited to painting, wax application, and sanding) using similar filters per Condition 3.2.1 are at least as efficient as the booth filter tested.  
[391-3-1-.02(3)(a)]
- 4.2.9 Within 180 days of the initial startup of vehicle production, the Permittee shall conduct a performance test on the thermal oxidizer (RTO) to determine NOx emissions and demonstrate initial compliance with Condition 3.2.12 for the RTO.  
[391-3-1-.02(3)(a)]

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**

**5.1 General Monitoring Requirements**

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

**5.2 Specific Monitoring Requirements**

40 CFR 63 Subpart IIII

- 5.2.1 The Permittee shall install, calibrate and maintain and operate continuous parameter monitoring systems (CPMS) to continuously monitor and record the gas/combustion temperature of the RTO. In doing so, the Permittee shall comply with the following requirements for the combustion temperature CPMS:  
[40 CFR 63.3168(c)]
- a. Install the gas temperature monitor/CPMS in the firebox of the RTO or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.
  - b. Meet the following requirements:
    - i. Locate the gas temperature sensor in a position that provides a representative temperature.
    - ii. Use a temperature sensor with a measurement sensitivity of 4°F or 0.75% of the temperature value, whichever is larger.
    - iii. Shield the temperature sensor system from electromagnetic interference and chemical contaminants.
    - iv. If a gas temperature chart recorder is used, it must have a measurement sensitivity in the minor division of at least 20°F.
    - v. Perform an electronic calibration at least semiannually according to the manufacturer's owner's manual, and then conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor reading
    - vi. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
    - vii. At least monthly, inspect components for integrity and electrical connections for continuity, oxidation, and galvanic corrosion.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 5.2.2 The Permittee shall install, calibrate and maintain and operate continuous parameter monitoring systems (CPMS) to continuously monitor and record desorption inlet gas stream temperature on the rotary concentrators. In doing so, the Permittee shall comply with the following requirements for the desorption gas temperature CPMS:  
[40 CFR 63.3168(f)]
- a. Install the gas temperature monitor/CPMS in desorption gas stream immediately prior to the concentrator desorption zone.
  - b. Meet the following requirements:
    - i. Locate the gas temperature sensor in a position that provides a representative temperature.
    - ii. Use a temperature sensor with a measurement sensitivity of 4°F or 0.75% of the temperature value, whichever is larger.
    - iii. Shield the temperature sensor system from electromagnetic interference and chemical contaminants.
    - iv. If a gas temperature chart recorder is used, it must have a measurement sensitivity in the minor division of at least 20°F.
    - v. Perform an electronic calibration at least semiannually according to the manufacturer's owner's manual, and then conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor reading
    - vi. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
    - vii. At least monthly, inspect components for integrity and electrical connections for continuity, oxidation, and galvanic corrosion.
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate CPMS to continuously monitor and record the operating parameters of each capture system feeding the RTO and rotary concentrators in accordance with and allowed by Table 1 to 40 CFR 63 Subpart IIII. For the clearcoat spray booths, the duct pressure or airflow rate shall be monitored on the rotary concentrator duct at a point downstream of the split to re-circulate the air. In doing so, the Permittee shall comply with the following requirements for the CPMS involved:  
[40 CFR 63.3168(g)]
- a. For each CPMS measuring gas flow, the Permittee shall meet the following requirements:
    - i. Locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the add-on control device.
    - ii. Reduce swirling flow or abnormal velocity distributions due to upstream and downstream disturbances.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- iii. Conduct a flow sensor calibration check at least semiannually.
  - iv. At least monthly, inspect components for integrity, electrical connections for continuity, and mechanical connections for leakage.
- b. For each CPMS measuring pressure drop, the Permittee shall meet the following requirements:
- i. Locate the pressure sensor(s) in or as close to a position that provides a representative measurement of the pressure drop across each opening that is being monitored.
  - ii. Minimize or eliminate pulsating pressure, vibration, and internal and external corrosion.
  - iii. Check pressure tap pluggage daily.
  - iv. Using an inclined manometer with a measurement sensitivity of 0.0002 inch water column, check gauge calibration quarterly and transducer calibration monthly.
  - v. Conduct calibration checks any time the sensor exceeds the manufacturer's specified maximum, operating pressure range or install a new pressure sensor.
  - vi. At least monthly, inspect components for integrity, electrical connections for continuity, and mechanical connections for leakage.

5.2.4 The Permittee shall meet the following requirements for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

[40 CFR 63.3168(b)]

- a. Monitor or secure the valve or closure mechanism controlling the bypass line in a non-diverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the requirements specified in paragraphs a.i. through a.iv. of this condition.
- i. Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position shall be recorded, as well as every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.
  - ii. Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. The Permittee shall visually inspect the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the add-on control device to the atmosphere.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- iii. Ensure that any bypass line valve is in the closed (non-diverting) position through monitoring of valve position at least once every 15 minutes. The Permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.
    - iv. Use an automatic shutdown system in which the coating operation is stopped when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the coating operation is running. The Permittee shall inspect the automatic shutdown system at least once every month to verify that it will detect diversions of flow and shut down the coating operation.
  - b. If any bypass line is opened, the Permittee shall include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in Condition 6.2.11.
- 5.2.5 The Permittee shall install, operate, and maintain each CPMS specified in Conditions 5.2.1, 5.2.2 and 5.2.3 according to the requirements of paragraphs a. through f. of this condition. The Permittee shall install, operate, and maintain each CPMS specified in Condition 5.2.4 according to the requirements of paragraphs c. and d. of this condition.  
[40 CFR 63.3168(a)]
  - a. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. Each hour of CPMS operation shall have a minimum of four equally spaced successive cycles.
  - b. The Permittee shall determine the average of all recorded readings for each successive 3-hour block period of the emission capture system and add-on control device operation.
  - c. The Permittee shall record the results of each inspection, calibration, and validation check of the CPMS.
  - d. The Permittee shall maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment.
  - e. The Permittee shall not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The Permittee shall use all the data collected during all other periods, including startups and shutdowns, in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.
  - f. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Except for periods of required

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

quality assurance or control activities, any period during which the CPMS fails to operate and record data continuously as required by paragraph a. of this condition, or generates data that cannot be included in calculating averages constitutes a deviation from the monitoring requirements.

40 CFR 60 Subpart IIII

5.2.6 Each of the emergency stationary diesel generators and fire pump engines shall be equipped with a non-resettable hour meter to track the number of hours operated during any type of operation and during each calendar month. The Permittee shall record the time of operation of each generator and engine and the reason the generator or engine was in operation during that time.

[40 CFR 60.4209(a) and 60.4214(b)]

5.2.7 The Permittee shall operate and maintain the emergency generators subject to 40 CFR 60 Subpart IIII according to the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer. In addition, the Permittee shall only change those settings that are permitted by the manufacturer. The Permittee shall also meet the requirements of 40 CFR 94 and/or 1068 as they apply.

[40 CFR 60.4211(a)]

Particulate Matter Monitoring, Work Practice Standards, and 391-3-1-.02(2)(t)

5.2.8 The Permittee shall perform monthly inspections to ensure compliance with the work practice standards of Conditions 3.2.16, 3.3.7, 3.3.8, 3.3.9, 3.4.7 and 3.4.8. Inspection reports shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.

[391-3-1-.02(6)(b)1]

5.2.9 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of 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]

- a. Pressure drop across each paint booth filter used in the sources in the table below. Data shall be recorded daily, if operated. The filter shall be changed within 24 hours after a pressure drop measurement exceeding manufacturer's recommended maximum pressure drop is recorded.

| Unit ID          | Unit Description                                      |
|------------------|---|
| UBS1, UBS2       | UBS booths  |
| RB01, APB1, VPTU | Touchup booths (paint shop, assembly, and Glovis VPC) |

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

| Unit ID          | Unit Description                  |
|------------------|-----------------------------------|
| CWD1, CWD2       | Paint shop cavity wax booths      |
| VPBW             | VPC underbody wax booth           |
|                  | Paint shop Sanding (all stations) |
| PSB1, PSB2       | Guide coat Booths (2)             |
| BSB1, BSB2, BSB3 | Topcoat Basecoat booths (3)       |
| CFD1, CFD2, CFD3 | Topcoat Clearcoat booths (3) *    |

\* Topcoat clearcoat booths are also controlled by the zeolite rotary concentrators.

Monitoring for Small Gaseous Fuel Units

- 5.2.10 The Permittee shall verify that all natural gas combustion units (boilers, ASH, indirect ovens, and rooftop air makeup units), comply with the requirements of Condition 3.2.12 by maintaining records containing the vendor's emission documentation.  
[391-3-1-.02(6)(b)1]



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS**

**6.1 General Record Keeping and Reporting Requirements**

6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.  
[391-3-1-.02(6)(b)1(i)]

6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv),

6.1.3 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.
- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
  - f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- 6.1.4 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.3, the following excess emissions, exceedances, and excursions shall be reported:  
[391-3-1-.02(6)(b)1,40 CFR 60.48c, 40 CFR 60.395, 40 CFR 63.3130]
- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.3, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)  
  
None required to be reported in accordance with Condition 6.1.3.
  - b. Exceedances: (means for the purpose of this Condition and Condition 6.1.3, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
    - i. Any period of twelve (12) consecutive months during which the VOC emissions from the entire facility exceed 491 tons;
    - iv. Any period of twelve (12) consecutive months during which the total VOC emissions from body wiping, strippable paint booth coatings, and equipment cleaning processes exceed 90 tons;
    - v. Any exceedance of a VOC emission limit established as BACT in Conditions 3.2.3 through 3.2.11;
    - vi. Any monthly average HAP emission from coating operations specified in Condition 3.3.2 that exceeds the applicable NESHAP;
    - vii. Any calendar month during which the average HAP emissions from all adhesives, and sealers (other than glass bonding sealer) exceed 0.01 lb/lb material;
    - viii. Any calendar month during which the average HAP emissions from all deadener material exceed 0.01 lb/lb material;

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- ix. Any calendar month during which the VOC emissions from the E-coat, guide coat (primer surfacer) or topcoat operations exceed the respective NSPS limit in Conditions 3.3.11 through 3.3.13 (if no exceedance occurs, the report shall so state);
  - x. Any exceedance of an applicable VOC emission limit of Georgia Rule (t) in Conditions 3.4.5, 3.4.6 or 3.4.9;
  - xi. Any occurrence which fuel other than natural gas (for external combustion sources) or ultra low sulfur diesel (internal combustion engines) is combusted.
  - xii. Any use of cleaner or mold release agent at Transys prohibited by NESHAP III.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.3, 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 block period during which the average gas stream/combustion temperature of the RTO is lower than the minimum temperature specified in Condition 3.3.5.
  - ii. Any three-hour block period during which the average gas volumetric flow or duct pressure on any VOC emissions capture system is lower than that established during the most recent performance, or, for PTE's, if the average measured parameter falls below the criteria set by Method 204.
  - iii. Any three-hour block period during which the average desorption gas inlet temperature of the rotary concentrators is lower than the minimum operating limit specified in Condition 3.3.6.
  - iv. Any instance in which the inspection and/or filter replacement, as required by Condition 5.2.9, is not performed.
  - v. Any instance in which the inspections for work practice standards as required by Condition 5.2.8 is not performed.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

## **6.2 Specific Record Keeping and Reporting Requirements**

### 40 CFR 60 Subpart MM, Plantwide Production & Georgia Rule (t) Record Keeping, Compliance Demonstration & Reporting Requirements

#### **Record Keeping Requirements**

- 6.2.1 The Permittee shall keep, for each of the coating operations and/or production processes/activities subject to Georgia Rule 391-3-1-.02(2)(t), and/or 40 CFR 60, Subpart MM, appropriate batch, shipment, daily and/or monthly material usage and/or operation/production records. The records shall meet the record keeping requirements in the pertinent State and Federal rules, and shall allow the demonstration of whether the operations and/or production processes/activities involved are in compliance with the applicable emission and/or operational limits or standards in this permit. Such records shall include, but are not limited to, those necessary such as gallons of coatings, thinners, sealers, adhesives, clean-up solvents and other VOC materials used, VOC and solids content(s) (weight or volume percent as appropriate) of the coatings, sealers, adhesives and other VOC-containing materials as applied or received, Division-approved or rule-specified coating transfer efficiencies, Division approved overall control efficiency of the VOC control system(s) involved, downtime or malfunction time of the VOC control system(s) if applicable, and number of vehicles produced each month.

The Permittee may subtract from the monthly usage any VOC-containing material disposed as containerized waste or recovered for reuse provided that the total weight, VOC content (expressed as a weight percentage), and documentation of the method for determining the VOC content of such material be included as part of the monthly records. All calculations used to determine the material usage and VOC content should be kept as part of the monthly records.

Material information/data from results of EPA Method 24, material safety data sheets (MSDS), product data sheets (PDS), manufacturer's formulation data and/or technical bulletin are acceptable for the purpose of this condition provided that they are permissible by the pertinent rules/standards or approved by the Division.  
[391-3-1-.02(6)(b)1.]

- 6.2.2 The Permittee shall use the appropriate operation/production records in Condition 6.2.1 to determine the total number of the vehicles produced during each calendar month by this facility. The Permittee shall notify the Division in writing if the production during any calendar month exceeds 43,750 units. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Condition 2.1.1. The Permittee shall use the monthly vehicle production data in Condition 6.2.1 to calculate the rolling 12-month total of the vehicles produced by the facility for each calendar month in the reporting period. All calculations should be kept as part of the monthly record required in Condition 6.2.1. Each 12-month rolling total shall be included in the report specified in Condition 6.1.3. The Permittee shall notify the Division in writing if any of the 12-month rolling total of the

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

vehicles produced by the facility exceeds 525,000 units. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the production limit in Condition 2.1.1.

[391-3-1-.02(6)(b)1.]

**Compliance Demonstration Requirements for Georgia Rule (t)**

- 6.2.3 The Permittee shall demonstrate compliance with the VOC emission limit for the use of wipe-off solvents in Condition 3.4.6 and the VOC emission limit for cleaning of body shop floor in Condition 3.4.9, using the appropriate material usage, VOC content and production records in Conditions 6.2.1 and 6.2.2. The initial 12-rolling month compliance period consists of the first 12 months of the operation from the initial startup of this facility; the second 12-rolling month compliance period consist of 2<sup>nd</sup> through 13<sup>th</sup> month from the startup of this facility; and so on. The Permittee shall use the equation below to calculate the 12-month rolling averages for the current month by the 15<sup>th</sup> of the following calendar month:

$$E = \frac{\sum_{i=1}^{12} \left( \frac{W_{voc,i}}{N_i} \right)}{12} \quad \text{Equation 6.2.3-1}$$

Where:

- E*: The current 12-month rolling average of the VOC emissions from the use of wipe-off solvent **or** the cleaning of body shop floor, pounds of VOC per unit of vehicle assembled;
- W<sub>voc,i</sub>*: VOC emissions from the use of wipe-off solvent **or** cleaning of body shop floor during the i<sup>th</sup> month within the current 12-month rolling average period, pounds;
- N<sub>i</sub>*: Total number of vehicles assembled during the i<sup>th</sup> month within the current 12-month rolling average period.

The Permittee shall notify the Division in writing if any of the rolling 12-month average VOC emissions exceeds the applicable limit in Condition 3.4.6 or 3.4.9. This notification shall be postmarked by the 15<sup>th</sup> day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit involved. All the rolling 12-month average of VOC emissions shall be included in the reports specified in Condition 6.1.3.

[391-3-1-.02(6)(b)1]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

6.2.4 The Permittee shall demonstrate compliance with the VOC emission limits in Condition 3.4.5 (Georgia Rule (t)) using the appropriate material usage, VOC content and production records in Conditions 6.2.1 and 6.2.2. The Permittee shall use the applicable equations and/or approaches in this condition to calculate the daily or monthly average emissions or to determine the VOC emissions from the operations involved:  
[391-3-1-.02(6)(b)1]

a. For VOC emissions from the E-coat operation:

$$E_{EDP} = \frac{\sum_{i=0}^n \{ (C_{EDP,i}) (V_{EDP,i}) \} (1 - R_{EDP})}{\sum_{i=0}^n (V_{EDP,i})} \quad \text{Equation 6.2.4-1}$$

Where:

$E_{EDP}$ : The monthly weighted average of VOC emissions from the EDP/electrophoretic applied prime operation/coating tank, pounds of VOC per gallon of coating excluding water;

$C_{EDP,i}$ : VOC content of the prime coating solution in the coating tank after the  $i^{\text{th}}$  addition of EDP/electrophoretic coating solution to the EDP coating tank during the month ( $C_{EDP,0}$  designates to the VOC content of the coating solution in the EDP coating tank at the beginning of the month), pounds of VOC per gallon of the coating solution;

$C_{EDP,i}$  shall be determined using the following equation:

$$C_{EDP,i} = \frac{[(C_{EDP,i-1})(V_{EDP,i-1}) + (C_{EDP,add,i})(V_{EDP,add,i})]}{(V_{EDP,i-1}) + (V_{EDP,add,i})}$$

Where  $C_{EDP,i-1}$  and  $V_{EDP,i-1}$  represent respectively the VOC content and volume of the coating solution (excluding water) inside the EDP coating tank before the  $i^{\text{th}}$  addition of the coating solution.  $C_{EDP,add,i}$  and  $V_{EDP,add,i}$  represent respectively the VOC content and volume of  $i^{\text{th}}$  addition of the coating solution to the EDP coating tank.

$V_{EDP,i}$ : Gallons of the coating solution in the coating tank excluding water after the  $i^{\text{th}}$  addition of the EDP/electrophoretic coating solution to the EDP coating tank during the month ( $V_{EDP,0}$  designates to the total volume the EDP/electrophoretic solution inside the EDP coating tank at the beginning of the month), which shall be determined below:

$$V_{EDP,i} = V_{EDP,i-1} + V_{EDP,add,i}$$

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

$R_{EDP}$ : Overall control efficiency of the capture system and RTO serving the E-coat tank and curing oven.  $R_{EDP}$  shall be assumed zero when the 3-hour block average RTO temperature is less than that established during the most recent performance test unless otherwise specified by the Division.

- b. For VOC emissions from each spray prime, topcoat and final repair operation that demonstrates compliance via a daily weighted average:

$$E_{VOC} = \frac{\sum_{j=1}^m \{ (C_{coating VOC, j}) (V_{coating, j}) (1 - R_{voc, j}) \}}{\sum_{j=1}^m (V_{coating solids, j})} \quad \text{Equation 6.2.4-2}$$

Where:

$E_{VOC}$ : The daily weighted average VOC emissions from each spray prime, topcoat or final repair operation involved, pounds of VOC per gallon of applied coating solids for spray prime and topcoat operation or pounds of VOC per gallon of coating solids sprayed for final repair operation;

$C_{coating VOC, j}$  VOC content of the  $j^{th}$  spray prime, topcoat or final repair coating used by each spray prime, topcoat or final repair operation involved during the day, pounds of VOC per gallon of the coating;

$V_{coating, j}$  Volume of the  $j^{th}$  spray prime, topcoat or final repair coating used by each spray prime, topcoat or final repair operation involved during the day, gallons;

$R_{voc, j}$ : Overall efficiency of the VOC control system controlling the VOC emissions from the  $j^{th}$  spray prime, topcoat or final repair coating used by the spray prime, topcoat or final repair operation involved during the  $R_{EDP}$  shall be assumed zero when the 3-hour block average RTO temperature is less than that established during the most recent performance test unless otherwise specified by the Division.

$V_{coating solids, j}$  Total volume of the applied coating solids (coating solids that were deposited on the surface being coated) for the  $j^{th}$  spray prime and topcoat respectively, or total volume of the coating solids sprayed for the  $j^{th}$  spray final repair coatings, as used by each spray prime, topcoat or final repair operation involved during the day, gallons.

The Permittee may use the applicable coating transfer efficiencies in Condition 6.2.7 to determine the applied coating solids.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- c. For VOC emissions from the use of sealer, adhesive, body glass edge cleaner, pre-priming cleaner, primer to bond glass or to the body to prepare the glass and body for bonding, adhesive to bond body glass to the body, coatings used in final repair operation(s) that does not involve in daily average, and all other materials subject to Condition 6.4.6k., the Permittee shall use results of EPA Method 24 tests, MSDS, PDS, manufacturer's formulation data and/or technical bulletin MSDS sheets, formulation data, and/or other product and/or production information, as required by Condition 6.2.1 and approved by the Division, to demonstrate that the VOC content of each of the materials involved is equal to or below the corresponding limit in Condition 3.4.5.

The Permittee shall notify the Division in writing if any of the VOC emissions exceeds the applicable limit in Condition 3.4.5. This notification shall be postmarked by the 15<sup>th</sup> day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit involved.

- 6.2.5 The Permittee shall use the records required in Condition 6.2.1 to calculate the monthly total VOC emissions from body wiping, strippable paint booth coatings, and equipment cleaning processes subject to the VOC BACT limit in Condition 3.2.11. All calculations should be kept as part of the monthly records as required by Condition 6.2.1. The Permittee shall notify the Division in writing if any monthly total VOC emission exceeds 7.5 tons. This notification shall be postmarked by the 15<sup>th</sup> day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition 3.2.11.

[391-3-1-.02(6)(b)1]

- 6.2.6 The Permittee shall use the monthly VOC emission data in Condition 6.2.5 to calculate the 12-month rolling total of the VOC emissions from body wiping, strippable paint booth coatings, and equipment cleaning processes. All calculations should be kept as part of the monthly records as required by Condition 6.2.1. The Permittee shall notify the Division in writing if any of the 12-month rolling totals of the VOC emissions exceed 90 tons. This notification shall be postmarked by the 15<sup>th</sup> day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 3.2.11.

[391-3-1-.02(6)(b)1]

**Compliance Demonstration Requirements for 40 CFR 60, Subpart MM**

- 6.2.7 The Permittee shall demonstrate compliance with the VOC emission limits in Conditions 3.3.11, 3.3.12 and 3.3.13 using the appropriate material usage, VOC content and production records in Condition 6.2.1, and follow the procedures specified below to determine the volume weighted average of the total mass of VOC per volume of coating solids used each calendar month:

[40 CFR 60.393]



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- a. Calculate the mass of VOC used during the calendar month for each EDP/electrophoretic applied prime coat, non-EDP prime coat, guide coat and/or topcoat operation:

$$M_o + M_d = \sum_{i=1}^n (L_{ci} D_{ci} W_{ci}) + \sum_{j=1}^m (L_{dj} D_{dj} W_{dj}) \quad \text{Equation 6.2.7-1}$$

Where:

$M_o$ : Total mass of VOC in coatings (EDP prime coat, non-EDP prime coat, guide coat and/or topcoat) as received, kilogram (kg);

$M_d$ : Total mass of VOC in dilution solvent, kg;

$L_{ci}$ : Volume of coating i consumed, as received, liters;

$D_{ci}$ : Density of coating i as received, kilogram (kg) per liter;

$W_{ci}$ : Mass ratio/fraction of VOC in coating i as received; kg of VOC per kg of coating i;

$L_{dj}$ : Volume of each type VOC dilution solvent (j) added to the coatings, as received, liters;

$D_{dj}$ : Density of each type VOC dilution solvent j added to the coatings, as received, kg per liter;

$W_{dj}$ : Mass ratio/fraction of VOC in each type VOC dilution solvent (j), added to the coatings, as received; kg of VOC per kg of the solvent.

- b. Calculate the total volume of coating solids used during the calendar month for each EDP/electrophoretic applied prime coat, non-EDP prime coat, guide coat and/or topcoat operation:

$$L_s = \sum_{i=1}^n (L_{ci} V_{si}) \quad \text{Equation 6.2.7-2}$$

Where:

$L_s$ : Volume of solids in coatings consumed, liters;

$n$ : Total number of coatings used;

$L_{ci}$ : Volume of coating i consumed, as received, liters;

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

$V_{si}$ : Volume ration/fraction of solids in coating i, as received, liter of coating solids per liter of coating i;

- c. Select the appropriate transfer efficiency (T) from the following tables for each surface operation:

Table 6.2.7-1: Overall Transfer Efficiency of the Coating Operations Using Total Purge Material Capture

| Application Method                                    | Transfer Efficiency, Mass Fraction |
|---|------------------------------------|
| Air Atomized Spray (Waterborne Coating)               | 0.39                               |
| Air Atomized Spray (Solvent-borne Coating)            | 0.50                               |
| Manual Electrostatic Spray                            | 0.75                               |
| Automatic Electrostatic Spray                         | 0.95                               |
| Electrodeposition (EDP)/Electrophoretic Applied Prime | 1.00                               |

Table 6.2.7-2: Overall Transfer Efficiency of the Coating Operations Not Collecting Any Purge Material After Purging

| Application Method                         | Transfer Efficiency, Mass Fraction |
|--|------------------------------------|
| Air Atomized Spray (Waterborne Coating)    | 0.30                               |
| Air Atomized Spray (Solvent-borne Coating) | 0.40                               |
| Manual Electrostatic Spray                 | 0.62                               |
| Automatic Electrostatic Spray              | 0.95                               |

It the Permittee can justify to the Division's satisfaction that other values for the transfer efficiencies are appropriate, the Division will approve their use on a case-by-case basis.

When more than one application method (l) is used on an individual surface coating operation, the Permittee shall use the follow to determine an average transfer efficiency (T) for the operation:

$$T = \frac{\sum_{i=1}^n (T_l V_{si} L_{cil})}{\sum_{l=1}^p (L_s)}$$

Where:

$T_l$ : Transfer efficiency of the application method (l);

$V_{si}$ : Fraction/proportion of coating solids by volume in each coating (i) as received;

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

$L_{cil}$ : Volume of each coating (i) consumed by each application method (l), as received, liters;

$L_s$ : Volume of coating solids consumed, liters;

- d. Calculate the volume weighted average mass of VOC per volume of applied coating solids (G) during each calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s T} \quad \text{Equation 6.2.7-3}$$

- e. Calculate the volume weighted average mass of VOC per volume of applied coating solids (G) emitted after the RTO (or concentrators) for each affected facility/coating operation by the following equation:

$$N = G(1 - R_{voc}) \quad \text{Equation 6.2.7-4}$$

Where:

$N$ : The post-control volume weighted monthly average VOC emissions rate for the affected facility/coating operation, pounds of VOC per gallon of coating solids as applied after the control;

$R_{voc}$ : Overall control efficiency of the capture system and RTO.  $R_{voc}$  shall be assumed zero when the 3-hour block average RTO temperature is less than that established during the most recent performance test unless otherwise specified by the Division. For Topcoat Clearcoat booths, overall control efficiency includes capture system, rotary concentrators, and RTO used to destroy desorbed VOC from concentrators.

If the  $G$  or  $N$  as calculated monthly for a specific affected facility/coating operation is less than the applicable emission standard in Conditions 3.3.11, 3.3.12 or 3.3.13, the source is in compliance.

### **Reporting Requirements for 40 CFR 60 Subpart MM**

6.2.8 The Permittee shall submit the following reports:  
[40 CFR 60.395]

- a. The Permittee shall submit an initial compliance report including the following information:

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- i. The volume weighted average mass of VOC per volume of applied coating solids for each coating operation subject to 40 CFR 60 Subpart MM (e-coat, guide coat and topcoat);
  - ii. The total mass of VOC per volume of applied coating solids before and after the RTO (or rotary concentrators, as applicable to the clearcoat spray booths)
  - iii. Efficiency of each VOC capture system feeding the RTO or concentrators;
  - iv. Destruction of the RTO (or concentrators and subsequent RTO, for the topcoat clearcoat booths) used to attain the compliance with the applicable emission limit(s);
  - v. A description of the method used to establish the fraction of VOC captured and sent to the RTO (and rotary concentrators for clearcoat booths).
- b. The Permittee shall submit quarterly reports of any exceedance of the limits of Conditions 3.3.11, 3.3.12 or 3.3.13, within 30 days of the end of each calendar quarter. If no exceedances occur, the Permittee shall indicate such in the report in accordance with Condition 6.1.3.

40 CFR 63 Subpart IIII Record Keeping, Compliance Demonstration & Reporting Requirements

**General Compliance Requirements**

- 6.2.9 The Permittee is in compliance with the applicable HAP emission limits and/or operating and/or work practice standards of 40 CFR 63 Subpart IIII provided that:  
[40 CFR 63.3100]
- a. The Permittee shall comply with the emission limits in Conditions 3.3.2, 3.3.3 and 3.3.4 at all times, as determined on a monthly basis.
  - b. The affected sources/coating operations involved are in compliance with the operating limits for the capture systems and add-on control devices required by Condition 3.3.5 and 3.3.6 at all times.
  - c. The Permittee shall comply with the work practice standards in Conditions 3.3.7, 3.3.8 and 3.3.9 at all times.
  - d. The Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- e. The Permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, RTO, rotary concentrators, and CPMS involved during the period between initial startup of the facility and the date when the initial performance tests on the emission capture system and add-on control devices have been completed.

**Notifications**

- 6.2.10 The Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h), as applicable, by the dates in the respective sections.  
[40 CFR 63.3110]
- a. Initial Notification required by 40 CFR 63.9(b) no later than 120 days after initial startup of the affected sources.
  - b. Notification of Compliance Status required by 40 CFR 63.9(h) no later than 60 calendar days after the first day of the first full month following completion of all applicable performance tests. The Notification shall contain the information specified below and in 40 CFR 63.9(h).
    - i. Company name and address.
    - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
    - iii. Date of the report and beginning and ending dates of the reporting period. The reporting period is the applicable initial compliance period described in Condition 6.2.28 per 40 CFR 63.3160.
    - iv. Identification of the compliance option used for coating processes in the affected source during the initial compliance period, i.e., Condition 3.3.2.
    - v. Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
    - vi. If a deviation occurred, include the following information:
      - 1. A description and statement of the cause of the deviation.
      - 2. All the calculations used to determine the applicable emission rate or applicable average organic HAP content for the applicable emission limits in Condition 3.3.2 per 40 CFR 63.3090(a) that the source failed to meet.
    - vii. All data and calculations used to determine the monthly average mass of organic HAP emitted per volume of applied coating solids from all the coating or HAP materials subject to Condition 3.3.2.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- viii. All data and calculations used to determine the monthly mass average HAP content of the materials subject to the emission limits in Conditions 3.3.3 and 3.3.4 per 40 CFR 63.3090(c) or (d).
- ix. All data and calculations used to determine the transfer efficiency for guide coat (primer surfacer), topcoat coatings and all the subject coatings used in coating operations pursuant to 40 CFR 63.3082(c).
- x. The following information:
  - 1. For each emission capture system, a summary of the data and copies of the calculations supporting the determination that the emission capture system is a permanent total enclosure (PTE) or a measurement of the emission capture system efficiency. Include a description of the procedure followed for measuring capture efficiency, summaries of any capture efficiency tests conducted, and any calculations supporting the capture efficiency determination. If the data quality objective (DQO) or lower confidence limit (LCL) approach was used, the Permittee shall also include the statistical calculations to show the DQO or LCL criteria in appendix A to 40 CFR 63 Subpart KK were met.
  - 2. A summary of the results of each add-on control device performance test.
  - 3. A list of the RTO's, rotary concentrators', and each emission capture system's operating limits and a summary of the data used to calculate those limits.
- xi. A statement of whether or not the work practice plans required by Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094(b) and (c) were developed and implemented.

**Semiannual Compliance Report**

- 6.2.11 The Permittee shall submit semiannual compliance reports for each affected source according to the following requirements. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b) of this condition:  
[40 CFR 63.3120(a), (e), and (f)]
- a. *Dates.* The Permittee shall prepare and submit each semiannual compliance report according to the dates specified below:
    - i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in Conditions 6.2.25 and 40 CFR 63.3160 that applies to the affected source and ends on June 30 or December 31, whichever occurs first following the end of the initial compliance period.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  - iii. Each semiannual compliance report must be postmarked or delivered no later than August 29 or February 28, whichever date is the first date following the end of the semiannual reporting period.
- b. *General requirements.* The semiannual compliance report shall contain the following information, as applicable:
  - i. Company name and address.
  - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - iii. Date of report and beginning and ending dates of the reporting period.
- c. *No deviations.* If there were no deviations from the applicable emission limitations, operating limits, or work practices specified in Conditions 3.3.2 through 3.3.8 per 40 CFR 63.3090, 63.3093, and 63.3094, the semiannual compliance report shall include a statement that there were no deviations from the emission limitations during the reporting period. If control devices were used to comply with the emission limits, and there were no periods during which the CPMS were out of control as specified in 40 CFR 63.8(c)(7), the semiannual compliance report shall include a statement that there were no periods during which the CPMS were out of control during the reporting period.
- d. *Deviations.* If there was a deviation from the emission limits in Condition 3.3.3 or 3.3.4 per 40 CFR 63.3090(c) or (d), the semiannual compliance report shall contain the following information:
  - i. The beginning and ending dates of each month during which the monthly average organic HAP content exceeded the applicable emission limit.
  - ii. The volume and organic HAP content of each material used that is subject to the applicable organic HAP content limit.
  - iii. The calculation used to determine the average monthly organic HAP content for the month in which the deviation occurred.
  - iv. The reason for the deviation.
  - v. The number of deviations and, for each deviation, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over the applicable emission limit in Conditions 3.3.3 and 3.3.4 per 40 CFR 63.3090(c) or (d), and a description of the method used to estimate the emissions.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- e. *Deviations.* If there was a deviation from the applicable emission limit in Condition 3.3.2 per 40 CFR 63.3090, the semiannual compliance report shall contain the following information:
- i. The beginning and ending dates of each month during which the monthly organic HAP emission rate exceeded the applicable emission limit.
  - ii. The calculation used to determine the monthly organic HAP emission rate according to Conditions 6.2.29 and/or 6.2.30 per 40 CFR 63.3161 or 63.3171, excluding the background data supporting these calculations.
  - iii. The date and duration of any malfunctions of the capture system or add-on control devices used to control emissions from these operations.
  - iv. A brief description of the CPMS.
  - v. The date of the latest CPMS certification or audit.
  - vi. For each instance that the CPMS was inoperative, except for zero (low-level) and high-level checks, the date, time, and duration that the CPMS was inoperative; the cause (including unknown cause) for the CPMS being inoperative; and descriptions of corrective actions taken.
  - vii. For each instance that the CPMS was out of control, as specified in § 63.8(c)(7), the date, time, and duration that the CPMS was out-of-control; the cause (including unknown cause) for the CPMS being out-of-control; and descriptions of corrective actions taken.
  - viii. The date, time, and duration of each deviation from an operating limit in Conditions 3.3.5 and 3.3.6; and the date, time, and duration of each bypass of an add-on control device.
  - ix. A summary of the total duration and the percent of the total source operating time of the deviations from each applicable operating limit in Conditions 3.3.5 and 3.3.6 and the bypass of each add-on control device during the semiannual reporting period.
  - x. A breakdown of the total duration of the deviations from each operating limit in Conditions 3.3.5 and 3.3.6 and bypasses of each add-on control device during the semiannual reporting period into those that were due to control equipment problems, process problems, other known causes, and other unknown causes.
  - xi. A summary of the total duration and the percent of the total source operating time of the downtime for each CPMS during the semiannual reporting period.
  - xii. A description of any changes in the CPMS, coating operation, emission capture system, or add-on control devices since the last semiannual reporting period.
  - xiii. For deviations from the work practice standards, the number of deviations, and, for each deviation, the information in paragraphs xiii.1. and 2. below.
    1. A description of the deviation, the date, time, and duration of the deviation; and the actions you took to minimize emissions in accordance with Condition 6.2.9d. per 40 CFR 63.3100(d).
    2. A list of the affected sources or equipment for which a deviation occurred, the cause of the deviation (including unknown cause, if applicable), and any corrective actions taken to return the affected unit to its normal or usual manner of operation.



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- xiv. For deviations from an emission limitation in Condition 3.3.2 per 40 CFR 63.3090(a) or (b) or operating limit in Conditions 3.3.5 and 3.3.6, a statement of the cause of each deviation (including unknown cause, if applicable).
  - xv. For each deviation from an emission limitation in Condition 3.3.2 per 40 CFR 63.3090(a) or (b), or operating limit Conditions 3.3.5 and 3.3.6, a list of the affected sources or equipment for which a deviation occurred, an estimate of the quantity of each regulated pollutant emitted over any emission limit in Conditions 3.3.2, and a description of the method used to estimate the emissions.
- f. Deviation: If the Permittee used the separate electrodeposition primer organic HAP content limits in Condition 3.3.2 per 40 CFR 63.3092(a), and there was a deviation from these limits, the semiannual compliance report must contain the following information:
- i. Identification of each material used that deviated from the emission limit, and the date, time, and duration each was used.
  - ii. The determination of mass fraction of each organic HAP for each material identified in Condition 6.2.11f.i. The Permittee does not need to submit background data supporting this calculation, for example, information provided by material suppliers or manufacturers, or test reports.
  - iii. A statement of the cause of each deviation (including unknown case, if applicable).
  - iv. The number of deviations, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit in Condition 3.3.2, and a description of the method used to estimate the emissions.
- g. Deviation: If the Permittee used the separate electrodeposition primer bake oven capture and control limitations in Condition 3.3.2 per 40 CFR 63.3092(b), and there was a deviation from the limitations in Condition 3.3.2 or the applicable operating limit in Conditions 3.3.5 and 3.3.6, the semiannual compliance report must contain the following information:
- i. The beginning and ending dates of each month during which there was a deviation from the separate electrodeposition primer bake oven capture and control limitations in Condition 3.3.2.
  - ii. The date and time that each malfunction of the capture systems or control devices used to control emissions from the electrodeposition primer bake oven started and stopped.
  - iii. A brief description of the CPMS.
  - iv. The date of the latest CPMS certification or audit.
  - v. For each instance that the CPMS was inoperative, except for zero (low-level) and high-level checks, the date, time, and duration that the CPMS was inoperative; the cause (including unknown cause) for the CPMS being inoperative; and descriptions of corrective actions taken.
  - vi. For each instance that the CPMS was out of control, as specified in 40 CFR 63.8(c)(7), the date, time, and duration that the CPMS was out-of-control; the cause (including unknown cause) for the CPMS being out-of-control; and descriptions of corrective actions taken.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- vii. The date, time, and duration of each deviation from an operating limit in Conditions 3.3.5 and 3.3.6; and the date, time, and duration of each bypass of an add-on control device.
  - viii. A summary of the total duration and the percent of the total source operating time of the deviations from each operating limit in Conditions 3.3.5 and 3.3.6 and the bypasses of each add-on control device during the semiannual reporting period.
  - ix. A breakdown of the total duration of the deviations from each operating limit in Conditions 3.3.5 and 3.3.6 and bypasses of each add-on control device during the semiannual reporting period into those that were due to control equipment problems, process problems, other known causes, and other unknown causes.
  - x. A summary of the total duration and the percent of the total source operating time of the downtime for each CPMS during the semiannual reporting period.
  - xi. A description of any changes in the CPMS, coating operation, emission capture system, or add-on control devices since the last semiannual reporting period.
  - xii. A statement of the cause of each deviation (including unknown cause, if applicable).
- h. Deviation: For any deviation from an applicable work practice plan in Condition 3.3.7 or 3.3.8, the report shall contain the following information:
- i. The date, time, and duration of the deviation.
  - ii. The nature of the deviation, including a list of the affected sources or equipment for which the deviation occurred, and the cause of the deviation (including unknown cause, if applicable).
  - iii. The corrective action(s) taken to bring the applicable work practices into compliance with the work practice plan.
- i. Initial notification reports. The Permittee shall submit the initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in Condition 6.2.10b. per 40 CFR 63.3110(c) to the EPA via the CEDRI. The Permittee shall upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF).
- j. Semiannual compliance reports. The Permittee shall submit the semiannual compliance report required in Conditions 6.2.11 a. through h. to the EPA via the CEDRI. The Permittee shall use the appropriate electronic template on the CEDRI Web for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>).

### **Record Keeping Requirements**

- 6.2.12 The Permittee shall collect and keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart IIII, and the documentation supporting each notification.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

[40 CFR 63.3130(a)]

- 6.2.13 The Permittee shall keep all the records required in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). Failure to comply with any of the requirements in those conditions is a deviation from the applicable standard. Where appropriate, those records may be maintained as electronic spreadsheets or as a database. Except as provided in Condition 6.2.5, each record shall be kept for 5 years (on site for at least 2 years and may be off site for the remaining 3 years) following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.3131]

- 6.2.14 The Permittee shall collect and keep a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP, the density and the volume fraction of coating solids for each coating, the mass fraction of organic HAP and the density for each thinner, and the mass fraction of organic HAP for each cleaning material. If the Permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the Permittee shall keep a copy of the complete test report. If the Permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the Permittee shall keep the summary sheet of results provided by the manufacturer or supplier. If the Permittee uses the results of an analysis conducted by an outside testing lab, the Permittee shall keep a copy of the test report. There is no need to obtain the test report or other supporting documentation from the manufacturer or supplier.

[40 CFR 63.3130(b)]

- 6.2.15 The Permittee shall keep a monthly record of the data and information as required by this condition.

[40 CFR 63.3130(c)]

- a. For each coating used for EDP primer, guide coat (primer surfacer), topcoat, final repair, glass bonding primer, and glass bonding adhesive operations and for each coating, except for deadener and for adhesive and sealer that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), a record of the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids.
- b. For each thinner used for EDP primer, guide coat (primer surfacer), topcoat, final repair, glass bonding primer, and glass bonding adhesive operations and for each thinner, except for thinner used for deadener and for adhesive and sealer that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), a record of the volume used in each month, the mass fraction organic HAP content, and the density.
- c. For each deadener material and for each adhesive and sealer material, a record of the mass used in each month and the mass organic HAP content.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- d. A record of the calculation of the organic HAP emission rate for EDP primer (if complying with 40 CFR 63.3090(a), guide coat (primer surfacer), topcoat, final repair, glass bonding primer, and glass bonding adhesive plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c) for each month. This record must include all raw data, algorithms, and intermediate calculations. If the guidelines presented in the *“Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations,”* EPA-450/3-88-018, are used, the Permittee keep records of all data input to this protocol. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. These data shall be provided to the Division on request on paper, and in (if calculations are done electronically) electronic form.
  - e. A monthly record of the calculation of the average monthly mass organic HAP content of:
    - i. Sealers and adhesives; and
    - ii. Deadeners.
- 6.2.16 The Permittee shall keep the following record for each of the cleaning materials used during each month.  
[40 CFR 63.3130(d) through (f)]
- a. The name and volume of each of the cleaning materials.
  - b. The mass fraction of organic HAP of each of the cleaning materials.
  - c. The density of each of the cleaning materials.
- 6.2.17 The Permittee shall keep a record of the following information for each deviation from an emission limitation, operating limit, or work practice plan reported under Conditions 6.2.11d. through h. per 40 CFR 63.3120(a)(5) through (9).  
[40 CFR 63.3130(g)]
- a. The date, time, and duration of the deviation, and for each deviation, the information as reported under Conditions 6.2.11d. through h.
  - b. A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Conditions 6.2.11d. through h.
  - c. An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in Conditions 3.3.2, 3.3.3, and 3.3.4 per 40 CFR 63.3090(a) through (d) or any applicable operating limit in Conditions 3.3.5 and 3.3.6, and a description of the method used to calculate the estimate, as reported under Conditions 6.2.11d. through h.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- d. A record of actions taken to minimize emissions in accordance with Condition 6.2.9d. per 40 CFR 63.3100(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.
- 6.2.18 For each capture system that is a PTE, the Permittee shall keep a record of the data and documentation used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 CFR 51 for a PTE and has a capture efficiency of 100%, as specified per 40 CFR 63.3165(a).  
[40 CFR 63.3130(i)]
- 6.2.19 For each capture system that is not a PTE, the Permittee shall keep a record of the data and documentation used to determine capture efficiency according to the requirements specified per 40 CFR 63.3164 and 63.3165(b). The records shall contain, as applicable, the following data and information:  
[40 CFR 63.3130(j)]
- a. Records for a liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure. Records of the mass of total volatile hydrocarbon (TVH), as measured by Method 204A or F of appendix M to 40 CFR 51, for each material used in the coating operation, and the total TVH for all materials used during each capture efficiency test run, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or E of appendix M to 40 CFR 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 CFR 51 for either a temporary total enclosure or a building enclosure.
  - b. Records for a gas-to-gas protocol using a temporary total enclosure or a building enclosure. Records of the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or C of appendix M to 40 CFR 51, at the inlet to the add-on control device, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or E of appendix M to 40 CFR 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 CFR 51 for either a temporary total enclosure or a building enclosure.
  - c. Records for panel tests. Records needed to document a capture efficiency determination using a panel test as described in 40 CFR 63.3165(e) and (g), including a copy of the test report and calculations performed to convert the panel test results to percent capture efficiency values.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- d. Records for an alternative protocol. Records needed to document a capture efficiency determination using an alternative method or protocol, as specified in 40 CFR 63.3165(f), if applicable.
- 6.2.20 The Permittee shall keep the data and information specified below for each add-on control device organic HAP destruction or removal efficiency as determined by the most recent performance test per 40 CFR 63.3166.  
[40 CFR 63.3130(k)]
  - a. Records of each add-on control device performance test conducted per 40 CFR 63.3164 and 63.3166.
  - b. Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.
- 6.2.21 The Permittee shall keep records of the data and calculations used to establish the emission capture and add-on control device operating limits determined by the most recent performance test per 40 CFR 63.3167 and to document compliance with the operating limits as specified in Table 1 to 40 CFR 63, Subpart IIII.  
[40 CFR 63.3130(l)]
- 6.2.22 The Permittee shall keep records of the data and calculations used to determine the transfer efficiency for primer (guide coat and surfacer) and topcoat coatings and for all coatings, except for deadener and for adhesive and sealer that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c).  
[40 CFR 63.3130(m)]
- 6.2.23 The Permittee shall keep a record of the work practice plans required by Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094(b) and (c) and documentation implementing the plans on a continuous basis. Appropriate documentation may include operational and maintenance records, records of documented inspections, and records of internal audits.  
[40 CFR 63.3130(n)]
- 6.2.24 The Permittee shall keep records pertaining to the design and operation of control and monitoring systems must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors.  
[40 CFR 63.3130(o)]

**Compliance Demonstration Requirements for Adhesive, Sealer & Deadener**

- 6.2.25 The Permittee shall complete the initial compliance demonstration for the initial compliance period according to the requirements in Condition 6.2.26 per 40 CFR 63.3151. The initial compliance demonstration includes the calculations according to Condition 6.2.26 per 40 CFR 63.3151 and supporting documentation showing that during the initial compliance

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

period, the mass average organic HAP content for each group of materials was equal to or less than the applicable emission limits in Conditions 3.3.3 and 3.3.4.

The initial compliance period is the 1-month period beginning on the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period begins on the compliance date and extends through the end of that month plus the following month.

[40 CFR 63.3150]

6.2.26 The Permittee shall separately calculate the mass average organic HAP content of the materials used during the initial compliance period as defined in Condition 6.2.25 for each group of materials subject to any emission limit in Conditions 3.3.3 and 3.3.4 per 40 CFR 63.3090(c) and (d). If every individual material used within a group of materials meets the emission limit for that group of materials, the Permittee may demonstrate compliance with that emission limit by documenting the name and the organic HAP content of each material used during the initial compliance period. If any individual material used within a group of materials exceeds the emission limit for that group of materials, the Permittee shall determine the mass average organic HAP content according to the procedures below:

[40 CFR 63.3151]

- a. Determine the mass fraction of organic HAP for each material used during the compliance period using one of the options listed below:
  - i. Method 311 for determining the mass fraction of organic HAP according to the procedures specified below:
    1. Count each organic HAP present at 0.1% by mass or more for OSHA-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4), and at 1.0% by mass or more for other compounds. Express the mass fraction of each organic HAP counted as a value truncated to four places after the decimal point.
    2. Sum the total mass fraction of organic HAP in the test material and truncating the result to three places after the decimal point.
  - ii. Method 24 for determining the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP.
  - iii. Division-approved alternative method for determining the mass fraction of organic HAP (Following the procedure in 40 CFR 63.7(f) to submit the alternative test method for approval).
  - iv. Information from the supplier or manufacturer of the material. The Permittee may rely on information other than that generated by the test methods specified in paragraphs a.i. through iii. of this condition, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1% by mass or more for OSHA defined carcinogens, and at 1.0% by mass or more for other compounds. If there is a disagreement between such information and results of a test conducted according to paragraphs a.i. through iii. of this condition, then the test method results will take precedence, unless after

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

consultation, the facility demonstrates to the satisfaction of the Division that the facility's data are correct.

- v. When the organic HAP contained in solvent blends must be counted toward the total organic HAP mass fraction of the materials, and neither test data nor manufacturer's data for the solvent blends are available, the Permittee may use the default values for the mass fraction of organic HAP in the solvent blends listed in Table 3 or 4 to 40 CFR 63, Subpart IIII. If using the tables, the Permittee shall use the values in Table 3 for all solvent blends that match Table 3 entries, and may only use Table 4 if the solvent blends in the materials used do not match any of the solvent blends in Table 3 and the Permittee only knows whether the blend is aliphatic or aromatic. However, if the results of a Method 311 test indicate higher values than those listed on Table 3 or 4, the Method 311 results will take precedence, unless after consultation, the facility demonstrates to the satisfaction of the Division that the data from Table 3 or 4 are correct.
- b. Determine the density of each material used during the compliance period from test results using ASTM Method D1475-98 or, for powder coatings, test method A or test method B of ASTM Method D5965-02, or information from the supplier or manufacturer of the material. If there is disagreement between the ASTM test method results and the supplier's or manufacturer's information, the ASTM test method results will take precedence unless after consultation, the facility demonstrates to the satisfaction of the Division that the supplier's or manufacturer's data are correct.
- c. Determine the volume (liters) of each material used during each month by measurement or usage records.
- d. Determine the mass average organic HAP content of the materials used during the initial compliance period for each group of materials for which an emission limit is established in Conditions 3.3.3 and 3.3.4, using Equations 1 and 2 of 40 CFR 63.3151.
  - i. Calculate the mass average organic HAP content of adhesive and sealer materials other than components of the glass bonding system used in the initial compliance period using Equation 1 of 40 CFR 63.3151.
  - ii. Calculate the mass average organic HAP content of deadener materials used in the initial compliance period using Equation 2 of 40 CFR 63.3151.
- e. The affected source is in compliance when the calculated mass average organic HAP content for the compliance period is less than or equal to the applicable emission limit in Conditions 3.3.3 and 3.3.4. The Permittee shall keep all records used for the calculation as required by Condition 6.2.13. As part of the Notification of Compliance Status required by Condition 6.2.10, the Permittee shall submit a statement that the coating operations were in compliance with the emission limitations during the initial compliance period because the mass average organic HAP content was less than or



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

equal to the applicable emission limits in Conditions 3.3.3 and 3.3.4, determined according to this condition.

- 6.2.27 To demonstrate continuous compliance, the mass average organic HAP content for each compliance period, determined according to Condition 6.2.26, shall be less than or equal to the applicable emission limit in Conditions 3.3.3 and 3.3.4. A compliance period consists of one (1) month. Each month after the end of the initial compliance period described in Condition 6.2.25 is a compliance period consisting of that month.

If the mass average organic HAP emission content for any compliance period exceeds the applicable emission limit in Conditions 3.3.3 and 3.3.4, this is a deviation from the emission limitations for that compliance period and shall be reported as specified in Conditions 6.2.10b.vi. and 6.2.11d. per 40 CFR 63.3110(c)(6) and 63.3120(a)(5). The Permittee shall maintain records as specified per 40 CFR 63.3130 and 63.3131.

[40 CFR 63.3152]

**Compliance Demonstration Requirements for Coating and Glass Bonding Adhesive Emission Limits Specified in Condition 3.3.2**

- 6.2.28 The Permittee shall comply with the performance test and other initial compliance requirements specified below:
- [40 CFR 63.3160(a)]
- a. Install and operate all emission capture systems, add-on control devices, and CPMS no later than the initial startup of the affected sources specified in Condition 3.3.2 and conduct a performance test of each capture system and add-on control device per 40 CFR 63.3164 through 63.3166 and establish the operating limits required by Conditions 3.3.5 and 3.3.6 per 40 CFR 63.3093 no later than 180 days after the initial startup of the affected sources specified in Condition 3.3.2.
  - b. Develop and begin implementing the work practice plans required by Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094(b) and (c) no later than the compliance date.
  - c. Complete the initial compliance demonstration for the initial compliance period as defined in Condition 6.2.25, according to Conditions 6.2.29 and 6.2.30 per 40 CFR 63.3161 and 63.3171. The Permittee shall determine the mass of organic HAP emissions and volume of coating solids deposited in the initial compliance period. The initial compliance demonstration includes the results of emission capture system and add-on control device performance tests conducted per 40 CFR 63.3164 through 63.3166; supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in Condition 3.3.2; the operating limits established during the performance tests and the results of the continuous parameter monitoring required per 40 CFR 63.3168; and documentation of whether the Permittee developed and implemented the work practice plans required by Conditions 3.3.7 and 3.3.8.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- d. The Permittee does not need to comply with the operating limits for the emission capture system and add-on control device required by Conditions 3.3.5 and 3.3.6 until after the Permittee has completed the performance tests specified in Paragraph a. of this Condition. Instead, the Permittee shall maintain a log detailing the operation and maintenance of the emission capture system, add-on control device, and CPMS during the period between the initial startup of the affected sources specified in Condition 3.3.2 and the performance test date. The Permittee must begin complying with the operating limits for the affected source on the date the performance tests are completed.
- 6.2.29 To demonstrate initial compliance with either HAP emission limit in Condition 3.3.2, the Permittee shall meet all the requirements of this condition as listed below. When demonstrating compliance with the alternative emission limit of 0.5 lb/GACS (separate E-coat requirements), exclude all materials used in the E-Coat operations in items a. through n. below.
- [40 CFR 63.3161(a) through (j), (l) through (o), and 40 CFR 63.3171]
- a. The HAP emissions from the affected source specified in Condition 3.3.2 shall not exceed the applicable limit.
  - b. Except as provided in 40 CFR 63.3160(a)(4), establish and demonstrate continuous compliance during the initial compliance period with the operating limits required by Conditions 3.3.5 and 3.3.6 per 40 CFR 63.3093, using the procedures specified in Conditions 5.2.1, 5.2.2, 5.2.3 and 5.2.4 per 40 CFR 63.3167 and 63.3168.
  - c. Develop, implement, and document implementation of the work practice plans required by Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094(b) and (c) during the initial compliance period, as specified in Condition 6.2.23 per 40 CFR 63.3130(n).
  - d. Follow the procedures in paragraphs (e) through (o) of this condition to demonstrate compliance with the applicable emission limit in Condition 3.3.2. The Permittee may also use the guidelines presented in “*Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations*” in making this demonstration.
  - e. Follow the procedures specified in Condition 6.2.26 per 40 CFR 63.3151(a) through (c) to determine the mass fraction of organic HAP and the density and volume of each coating and thinner used during each month.
  - f. Determine the volume fraction of coating solids (liter of coating solids per liter of coating) for each coating used during the compliance period by a test or by information provided by the supplier or the manufacturer of the material, as specified below. If test results obtained according to paragraph f.i. of this condition do not agree with the information obtained under paragraph f.ii., the test results will take precedence unless after consultation, the facility demonstrates to the satisfaction of the Division that the facility’s data are correct.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- i. ASTM Method D2697-86 for determining the volume fraction of coating solids for each coating.
  - ii. Volume fraction of coating solids for each coating provided from the supplier or manufacturer.
- g. Determine the transfer efficiency for each primer surfacer and topcoat coating, and for all coatings, except for deadener and for adhesive and sealer that are not components of glass bonding systems, used in coating operations added to the affected source in Condition 3.3.2, using ASTM Method D5066-91, or the guidelines presented in “*Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations*”. The Permittee may conduct transfer efficiency testing on representative coatings and for representative spray booths as described in the “Protocol” aforementioned. The Permittee may assume 100% transfer efficiency for electrodeposition primer coatings, glass bonding primers, and glass bonding adhesives. For final repair coatings, the Permittee may assume 40% transfer efficiency for air-atomized spray and 55% transfer efficiency for electrostatic spray and high volume, low pressure spray.
- h. Calculate the total mass of organic HAP emissions before consideration of add-on controls from all coatings and thinners subject to Condition 3.3.2 and used during each month using Equation 1 of this condition:

$$H_{BC} = A + B \quad (\text{Eq. 1})$$

Where:

$H_{BC}$  = Total mass of organic HAP emissions before consideration of add-on controls during the month, kg.

$A$  = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this condition.

$B$  = Total mass of organic HAP in the thinners used during the month, kg, as calculated in Equation 1B of this condition.

When demonstrating compliance with the alternative emission limit of 0.5 lb/GACS (separate E-coat requirements), uncontrolled HAP emissions from E-Coat operations need not be included this total.

- i. Calculate the total mass of organic HAP in the coatings used during the month using Equation 1A of this condition:

$$A = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad (\text{Eq. 1A})$$

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

Vol<sub>c,i</sub> = Total volume of the i<sup>th</sup> coating used during the month, liters.

D<sub>c,i</sub> = Density of the i<sup>th</sup> coating, kg coating/liter coating.

W<sub>c,i</sub> = Mass fraction of organic HAP in the i<sup>th</sup> coating, kg organic HAP/kg coating.

m = Number of different coatings used during the month.

- ii. Calculate the total mass of organic HAP in the thinners used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (\text{Eq. 1B})$$

Where:

B = Total mass of organic HAP in the thinners used during the month, kg.

Vol<sub>t,j</sub> = Total volume of the j<sup>th</sup> thinner used during the month, liters.

D<sub>t,j</sub> = Density of the j<sup>th</sup> thinner, kg per liter.

W<sub>t,j</sub> = Mass fraction of organic HAP in the j<sup>th</sup> thinner, kg organic HAP/kg thinner.

n = Number of different thinners used during the month.

- i. Determine the mass of organic HAP emissions reduced for each controlled coating operation during each month using the procedures in paragraph j. of this condition to calculate the mass of organic HAP emission reduction for each controlled coating operation using an emission capture system and add-on control device other than a solvent recovery system.
- j. For each controlled coating operation using an emission capture system and add-on control device other than a solvent recovery system, calculate the mass of organic HAP emission reduction for the controlled coating operation, excluding all periods of time in which a deviation, including a deviation during a period of startup, shutdown, or malfunction, from an operating limit or from any CPMS requirement for the capture system or control device serving the controlled coating operation occurred, during the month using Equation 2 of this condition. Except as provided in paragraph p. of this

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

section, for any period of time in which a deviation occurred, the Permittee shall assume zero efficiency for the emission capture system and add-on control device involved.

$$H_{Cn} = (A_C + B_C - A_{unc} - B_{unc}) \left( \frac{CE}{100} \times \frac{DRE}{100} \right) \quad (\text{Eq. 2})$$

Where:

$H_{Cn}$  = Mass of organic HAP emission reduction, excluding all periods of time in which a deviation occurred, for the controlled coating operation during the month, kg.

$A_C$  = Total mass of organic HAP in the coatings used in the controlled coating operation during the month, kg, as calculated in Equation 2A of this condition.

$B_C$  = Total mass of organic HAP in the thinners used in the controlled coating operation during the month, kg, as calculated in Equation 2B of this condition.

$A_{unc}$  = Total mass of organic HAP in the coatings used during all periods of time in which a deviation occurred for the controlled coating operation during the month, kg, as calculated in Equation 2C of this condition.

$B_{unc}$  = Total mass of organic HAP in the thinners used during all periods of time in which a deviation occurred for the controlled coating operation during the month, kg, as calculated in Equation 2D of this condition.

$CE$  = Capture efficiency of the emission capture system vented to the add-on control device, percent as determined according to the most recent performance test.

$DRE$  = Organic HAP destruction or removal efficiency of the add-on control device, percent as determined according to the most recent performance test.

i. Calculate the mass of organic HAP in the coatings used in the controlled coating operation, kg, using Equation 2A of this condition.

$$A_c = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad (\text{Eq. 2A})$$

Where:

$A_C$  = Total mass of organic HAP in the coatings used in the controlled coating operation during the month, kg.

$Vol_{c,i}$ ,  $D_{c,i}$ ,  $W_{c,i}$  and  $m$  are defined under Equation 1A.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- ii. Calculate the mass of organic HAP in the thinners used in the controlled coating operation, kg, using Equation 2B of this condition.

$$B_c = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (\text{Eq. 2B})$$

Where:

$B_c$  = Total mass of organic HAP in the thinners used in the controlled coating operation during the month, kg.

$Vol_{t,j}$ ,  $D_{t,j}$ ,  $W_{t,j}$  and  $n$  are defined under Equation 2A.

- iii. Calculate the mass of organic HAP in the coatings used in the controlled coating operation during deviations specified in Condition 6.2.31 per 40 CFR 63.3163(c) and (d), using Equation 2C of this condition:

$$A_{unc} = \sum_{i=1}^m (VOLD_i)(D_i)(W_i) \quad (\text{Eq. 2C})$$

Where:

$A_{unc}$  = Total mass of organic HAP in the coatings used during all periods of time in which a deviation occurred for the controlled coating operation during the month, kg.

$VOLD_i$  = Total volume of the  $i^{\text{th}}$  coating used in the controlled coating operation during deviations, liters.

$D_i$  = Density of the  $i^{\text{th}}$  coating, kg per liter.

$W_i$  = Mass fraction of organic HAP in the  $i^{\text{th}}$  coating, kg organic HAP per kg coating.

$m$  = Number of different coatings.

- iv. Calculate the mass of organic HAP in the thinners used in the controlled coating operation during deviations specified Condition 6.2.31 per 40 CFR 63.3163(c) and (d), using Equation 2D of this condition:

$$B_{unc} = \sum_{j=1}^n (VOLD_j)(D_j)(W_j) \quad (\text{Eq. 2D})$$

Where:

$B_{unc}$  = Total mass of organic HAP in the thinners used during all periods of time in which a deviation occurred for the controlled coating operation during the month, kg.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

$VOLD_j$  = Total volume of the  $j^{th}$  thinner used in the controlled coating operation during deviations, liters.  
 $D_j$  = Density of the  $j^{th}$  thinner, kg per liter.  
 $W_j$  = Mass fraction of organic HAP in the  $j^{th}$  thinner, kg organic HAP per kg coating.  
 $n$  = Number of different thinners.

- k. Determine the total volume of coating solids deposited, liters, in the coating materials subject to the emission limit in Condition 3.3.2 using Equation 5 of this condition:

$$V_{sdep} = \sum_{i=1}^m (Vol_{c,i}) (V_{s,i}) (TE_{c,i}) / 100 \quad (\text{Eq. 5})$$

Where:

$V_{sdep}$  = Total volume of coating solids deposited during the month, liters.  
 $Vol_{c,i}$  = Total volume of the  $i^{th}$  coating used during the month, liters.  
 $V_{s,i}$  = Volume fraction of coating solids for the  $i^{th}$  coating, liter solids per liter coating, determined according to Condition 6.2.29f. per 40 CFR 63.3161(f).  
 $TE_{c,i}$  = Transfer efficiency of the  $i^{th}$  coating, determined according to Condition 6.2.29g. per 40 CFR 63.3161(g), expressed as a decimal.  
 $m$  = Number of coatings used during the month.

- l. Determine the mass of organic HAP emissions, kg, during each month, using Equation 6 of this condition.

$$H_{HAP} = H_{BC} - \sum_{i=1}^q (H_{Cn,i}) - \sum_{k=1}^q \sum_{m=1}^{Sk} (H_{DEV,k,m}) \quad (\text{Eq. 6})$$

Where:

$H_{HAP}$  = Total mass of organic HAP emissions for the month, kg.  
 $H_{BC}$  = Total mass of organic HAP emissions before add-on controls from all the coatings and thinners used during the month, kg, determined according to paragraph (h) of this condition.  
 $H_{Cn,i}$  = Total mass of organic HAP emission reduction for the  $i^{th}$  controlled coating operation not using a liquid-liquid material balance, excluding all periods of time in which a deviation occurred, for the controlled coating operation during the month, from Equation 2 of this condition.  
 $H_{DEV,k,m}$  = Mass of organic HAP emission reduction, based on the capture system and control device efficiency approved by the Division for period of the  $m^{th}$  deviation for the  $k^{th}$  controlled coating operation, kg, as determined according to Condition **Error! Reference source not found.**

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- q = Number of controlled coating operations not using a liquid-liquid material balance.
- Sk = Number of periods of deviation in the month for which non-zero capture and control device efficiencies have been approved for controlled coating operation, k.

- m. Determine the organic HAP emission rate for the month, kg organic HAP per liter coating solids deposited, using Equation 7 of this condition:

$$H_{rate} = \frac{(H_{HAP})}{(V_{sdep})} \quad (\text{Eq. 7})$$

Where:

- H<sub>rate</sub> = Organic HAP emission rate for the month compliance period, kg organic HAP per liter coating solids deposited.
- H<sub>HAP</sub> = Mass of organic HAP emissions for the month, kg, determined according to Equation 6 of this condition.
- V<sub>sdep</sub> = Total volume of coating solids deposited during the month, liters, from Equation 5 of this condition.
- n. To demonstrate initial compliance, the combined organic HAP emissions from the coating materials subject to the emission limit in Condition 3.3.2 shall be less than or equal to the applicable emission limitation in Condition 3.3.2. The Permittee shall keep all records as required per 40 CFR 63.3130 and 63.3131. As part of the Notification of Compliance Status required by Condition 6.2.10 per 40 CFR 63.3110, the Permittee shall submit a statement that the coating operations were in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Condition 3.3.2 and the operating limits required by Conditions 3.3.5 and 3.3.6 per 40 CFR 63.3093 and the work practice standards required by Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094 were achieved.
- o. To demonstrate initial compliance with the alternative 0.5 lb/GACS standard and separate E-coat requirements, the combined organic HAP emissions from the coating materials subject to the alternative emission limit in Condition 3.3.2 shall be less than or equal to 0.5 lb/GACS. The Permittee shall keep all records as required by Condition 6.2.13 per 40 CFR 63.3130 and 63.3131. As part of the Notification of Compliance Status required by Condition 6.2.10 per 40 CFR 63.3110, the Permittee shall submit a statement that the coating operations were in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Condition 3.3.2 and the operating limits required by Conditions 3.3.5 and 3.3.6 per 40 CFR 63.3093 and the work practice standards required by Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094 were achieved. In addition, the Permittee shall submit a statement that the organic HAP emissions from



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

the E-coat operation met either of the applicable emissions limitations in Condition 3.3.2 per 63.3092.

6.2.30 The Permittee may request approval from the Division to use non-zero capture efficiencies and add-on control device efficiencies for any period of time in which a deviation specified in Condition 6.2.31 occurred.  
[40 CFR 63.3161(p)]

- a. If the Permittee has manually collected parameter data indicating that a capture system or add-on control device was operating normally during a CPMS malfunction, a CPMS out-of-control period, or associated repair, then these data may be used to support and document the Permittee's request to use the normal capture efficiency or add-on control device efficiency for that period of deviation.
- b. If the Permittee has data indicating the actual performance of a capture system or add-on control device (e.g., capture efficiency measured at a reduced flow rate or add-on control device efficiency measured at a reduced thermal oxidizer temperature) during a deviation, then these data may be used to support and document the Permittee's request to use these values for that period of deviation.
- c. The organic HAP emission reduction achieved during each period of deviation for which the Division has approved the use of non-zero capture efficiency and add-on control device efficiency values is calculated using Equations 8, 8A and 8B of 40 CFR 63.3161(p).

6.2.31 The affected source is in continuous compliance with the applicable emission limit in Condition 3.3.2 when all the requirements of this condition are met:  
[40 CFR 63.3163]

- a. The organic HAP emission rate for each compliance period, determined monthly according to the procedures in Conditions 6.2.29 and 6.2.30, is equal to or less than the applicable emission limit in Condition 3.3.2. A compliance period consists of one (1) month for each month after the end of the initial compliance period described in Condition 6.2.10 per 40 CFR 63.3160.

If the organic HAP emission rate for any compliance period exceeded the applicable emission limit in Condition 3.3.2, this is a deviation from the emission limitation for that compliance period and shall be reported as specified in Conditions 6.2.10b.vi. and 6.2.11e. per 40 CFR 63.3110(c)(6) and 63.3120(a)(6).

- b. The Permittee demonstrates continuous compliance with each applicable operating limit required by Conditions 3.3.5 and 3.3.6 per 40 CFR 63.3093 (ref, Table 1 to 40 CFR 63 Subpart IIII). If an operating parameter is out of the allowed range specified in Conditions 3.3.5 and 3.3.6, the Permittee shall report the deviation as required

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- Conditions 6.2.10b.vi. and 6.2.11e. per 40 CFR 63.3110(c)(6) and 63.3120(a)(6), and assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation except as provided in Condition 6.2.30 per 40 CFR 63.3161(p).
- c. The Permittee shall meet the requirements for bypass lines in Condition 5.2.4 per 40 CFR 63.3168(b) for the HAP emission control devices used at this facility. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, the Permittee shall report the event as a deviation as required by Conditions 6.2.10b.vi. and 6.2.11e. per 40 CFR 63.3110(c)(6) and 63.3120(a)(6). For the purposes of completing the compliance calculations specified in 40 CFR 63.3161(k), the Permittee shall assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation.
  - d. The Permittee shall demonstrate continuous compliance with the work practice standards in Conditions 3.3.7 and 3.3.8 per 40 CFR 63.3094. If the Permittee did not develop a work practice plan, did not implement the plan, or did not keep the records required by Condition 6.2.23 per 40 CFR 63.3130(n), this is a deviation from the work practice standards that shall be reported as specified in Conditions 6.2.10b.vi. and 6.2.11e. per 40 CFR 63.3110(c)(6) and 63.3120(a)(6).
  - e. If there were no deviations from the emission limitations, submit a statement as part of the semiannual compliance report that the affected source was in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Condition 3.3.2, and the operating limits required by Conditions 3.3.5 and 3.3.6 and the work practice standards required by Conditions 3.3.7 and 3.3.8 were met during each compliance period.
  - f. The Permittee shall keep records as specified in 40 CFR 63.3130 and 63.3131.

40 CFR 60 Subpart IIII Record Keeping, Compliance Demonstration & Reporting Requirements for Emergency Stationary Diesel Engines/Generators

- 6.2.32 The Permittee shall maintain monthly operating records of each of the emergency stationary diesel generators and/or fire pump engines, including operating hours and reasons of the operation, i.e., emergency power generation and/or fire extinguishing, readiness testing and/or maintenance check. These records shall be kept available for inspection or submittal for five (5) years from the date of record.  
[40 CFR 60.4214(b)]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 6.2.33 The Permittee shall demonstrate compliance with the applicable emission limits in Conditions 3.3.20 through 3.3.22 by purchasing a stationary diesel engine(s)/generators certified to the applicable emission standards in Conditions 3.3.20 through 3.3.22, for the same model year and maximum engine power. The engine shall be installed and configured according to manufacturer's specifications.  
[40 CFR 60.4211(c)]
- 6.2.34 The Permittee shall keep records verifying that each shipment of diesel fuel received for firing the emergency stationary diesel generators and fire pump engines complies with the applicable requirements in NSPS IIII. Verification shall consist of either the fuel oil receipts and/or fuel supplier certifications or results of analyses of the fuel oils conducted by methods of sampling and analysis which have been specified or approved by the EPA or the Division. These records shall be kept available for inspection or submittal for five (5) years from the date of record.  
[40 CFR 60.4207)]
- 6.2.35 The Permittee shall comply with all the applicable requirements of the General Provisions of 40 CFR 60 as listed in Table 8 to 40 CFR 60, Subpart IIII.  
[40 CFR 60.4218]
- 6.2.36 The Permittee shall furnish the Division written notification of the date of the initial startup of each of the emergency stationary diesel generators and fire pump engines within fifteen (15) days after such date.  
[391-3-1-.02(2)(c)]

40 CFR 63 Subpart EEEE Record Keeping, Compliance Demonstration & Reporting Requirements for Subject Tank Farm

- 6.2.37 The Permittee shall keep documentation that each tank of capacity equal or less than 5,000 gallons is not required to be controlled. The documentation must be kept up-to-date (i.e., all such emission sources at a facility are identified in the documentation regardless of when the documentation was last compiled) and must be in a form suitable and readily available for expeditious inspection and review according to 40 CFR 63.10(b)(1), including records stored in electronic form in a separate location.  
[40 CFR 63.2343(a)]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 6.2.38 The Permittee shall submit a Notice of Compliance for tanks larger than 5,000 gallons and less than 10,000 gallons per EEEE, and maintain a record of annual average true vapor pressure for tank contents.  
[40 CFR 63.2343(b)]

Compliance Demonstration Requirements for BACT Emission Limits

- 6.2.39 The Permittee shall use the records required in Condition 6.2.1, the methods described in Condition 6.2.7, and the actual RTO and rotary concentrator destruction efficiencies (as applicable), capture efficiencies (as applicable) and paint spray transfer efficiencies (as applicable) determined from the most recent performance tests to calculate the monthly average VOC emission rates from the each of the following operations, in the units specified in Conditions 3.2.3 through 3.2.9. All calculations shall be part of this record and shall be available upon request.  
[391-3-1-.02(6)(b)1]

| Surface Coating Operation                 | Unit ID    | Control           |
|---|------------|-------------------|
| E-coat Tanks                              | EDT1, EDT2 | VOC carry over    |
| E-Coat Ovens                              | EOV1, EOVS | RTO               |
| Underbody Sealer Booths                   | UBS1&2     | VOC carry over    |
| Underbody Sealer Oven                     | UOV1       | RTO               |
| Primer Booths (2)                         | PSB1&2     | VOC carry over    |
| Primer Ovens (2)                          | POV1&2     | RTO               |
| Topcoat Basecoat Booths (3)               | BSB1&2&3   | VOC carry over    |
| Topcoat Basecoat Booth Flashoff areas (3) | FA1&2&3    | RTO               |
| Topcoat Clearcoat Booths (3)              | CFD1&2&3   | Concentrators/RTO |
| Topcoat Ovens (3)                         | TOV1&2&3   | RTO               |
| Body shop bonding materials               | BS1        | VOC Carry over    |
| Sealer application                        | SD1&2      | VOC carry over    |
| Cavity Wax Booths (2)                     | CWD1&2     | No Control        |
| Underbody Wax application                 | VPBW       | No Control        |
| Windshield Glazing application            | AWG1       | No Control        |

For the purpose of this condition, the Permittee shall assume zero efficiency for any VOC emission capture system for the RTO or rotary concentrators for any period of time a deviation from the applicable operating limit of Conditions 3.3.5 or 3.3.6 occurs, unless other data is available indicating the actual efficiency of RTO or rotary concentrators and the use of these data is approved by the Division.

- 6.2.40 The Permittee shall notify the Division in writing if the monthly VOC emissions from any operation specified in Condition 6.2.39 exceeds the BACT limit as established in Conditions 3.2.3 through 3.2.9. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the applicable limit.  
[391-3-1-.02(6)(b)1]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

Compliance Demonstration and Record Keeping Requirements for Plantwide VOC Limit

- 6.2.41 The Permittee shall maintain monthly usage records of all VOC containing materials for the entire facility. These records shall include all the information required for the calculation of the monthly plant-wide VOC emissions, such as the total weight of each VOC material used/processed and/or containerized VOC wastes disposed off-site, the VOC content of each VOC material and/or containerized VOC wastes disposed off-site (expressed as a weight percentage), the operation hours of the VOC control system(s), the overall VOC control efficiency of the VOC control system(s) approved by the Division, and periods during which the combustion chamber temperature of RTO, or periods during which the rotary concentrator desorption temperature, is less than the excursion temperature defined by Condition 6.1.4.  
[391-3-1-.02(6)(b)1]
- 6.2.42 The Permittee shall use the records required in Condition 6.2.41, fuel usage records required in Condition 6.2.44, and the emission factors for combustion specified in Application No. 28503 to calculate the monthly total VOC emissions from the entire facility for each calendar month. The Permittee shall notify the Division in writing if VOC emissions exceed 40.9 tons during any month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with Condition 2.1.2. All calculations should be kept as part of the monthly record required in Condition 6.2.41.  
[391-3-1-.02(6)(b)1]
- 6.2.43 The Permittee shall use the monthly VOC emission data in Condition 6.2.42 to calculate the 12-month rolling total of VOC emissions from the entire facility, including the VPC for each calendar month. All calculations should be kept as part of the monthly record required in Conditions 6.2.41. Each 12-month rolling total shall be included in the report required by Condition 6.1.3. The Permittee shall notify the Division in writing if any of the 12-month rolling totals of VOC emissions exceeds 491 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain future compliance with the emission limit in Condition 2.1.2.  
[391-3-1-.02(6)(b)1]

Compliance Demonstration and Record Keeping Requirements for Total GHG BACT

- 6.2.44 The Permittee shall maintain monthly usage records of all natural gas and diesel fuel consumed at the facility. The records shall include the total number of gallons of diesel and cubic feet of natural gas used in all the emissions units that burn these fuels. The Permittee shall calculate the combined 12-month rolling total for natural gas and fuel oil, for each calendar month and include it in each month's log. All calculations used to figure usages shall be kept as part of the monthly record. These records shall be kept available for inspection or submittal for five years from the date of record.  
[391-3-1-.02(6)(b)1]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

- 6.2.45 The Permittee shall use the records required in Condition 6.2.44 and the emission factors found in 40 CFR 98 Subpart C to document compliance with the Total GHG BACT for gas-fired units and diesel-fired units.

Compliance Demonstration and Record Keeping Requirements for NO<sub>x</sub> and PM/PM<sub>10</sub>/PM<sub>2.5</sub> BACT

- 6.2.46 The Permittee shall keep documentation that the filter used in the units listed in Table 3.1 satisfy the filter control efficiency requirements.
- 6.2.47 The Permittee shall keep documentation that all boilers, air supply houses (direct-fired), ovens (indirect-fired), flash-off hot air burners, and rooftop air makeup units are equipped with burners specified by the vendor to meet 35 ppm NO<sub>x</sub> at 3% O<sub>2</sub>.

40 CFR 63 Subpart ZZZZ Record Keeping, Compliance Demonstration & Reporting Requirements

- 6.2.48 The Permittee shall submit notification of startup of all emergency generator engines rated at 500 hp or less in accordance with 40 CFR 63.6645  
[40 CFR 63 ZZZZ]

40 CFR 63 Subpart III Record Keeping, Compliance Demonstration & Reporting Requirements

- 6.2.49 The Permittee shall keep documentation of the HAP content of all cleaners and mold release agents at the Transys molded polyurethane foam production operation.  
[40 CFR 63.1300]

40 CFR 63 Subpart DDDDD Record Keeping, Compliance Demonstration & Reporting Requirements

- 6.2.50 The Permittee shall submit annual and biennial compliance reports, as applicable, for Boilers BO01 through BO06 and all process heaters (indirect fired ovens) in accordance with the following requirements:  
[391-3-1-.02(6)(b)(1); 40 CFR 63.7550(b); and 40 CFR 63.7550(h)(3)]
- a. For the annual and biennial tune-up requirements specified in Condition 3.3.15, the Permittee shall submit a compliance report with the information specified in Condition 6.2.51. The initial compliance report must cover the period from the compliance date to December 31 (ending within 1 year for annual and 2 years for biennial). Each subsequent compliance report must cover the applicable 1 or 2-year period from January 1 to December 31, for annual tune ups or biennial tune ups, as applicable.
  - b. Each compliance report must be postmarked or submitted no later than February 28 of the following year.
  - c. All reports must be submitted electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the report must be submitted to U.S. EPA at the appropriate address

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

listed in 40 CFR 63.13. At the discretion of U.S. EPA, these reports must also be submitted in the format specified by U.S. EPA.

6.2.51 The Compliance reports required in Condition 6.2.25 shall contain the following information: [391-3-1-.02(6)(b)(1); 40 CFR 63.7550(a) and (c); and Item 1.a. of Table 9 to 40 CFR 63 Subpart DDDDD]

- a. Company and Facility name and address.
- b. Process unit information, emissions limitations, and operating parameter limitations, as applicable.
- c. Date of report and beginning and ending dates of the reporting period.
- d. The date of the most recent tune-up for boilers BO01 through BO06. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.
- e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

6.2.52 The Permittee shall keep the following records:  
[391-3-1-.02(6)(b)1(i) and 40 CFR 63.7555(a)]

- a. A copy of each notification and report that was submitted to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance reports that were submitted.

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**PART 7.0 OTHER SPECIFIC REQUIREMENTS**

**7.1 Specific Conditions**

- 7.1.1 The Permittee shall construct and operate the source or modification as defined in Application No. 28503 that is subject to Georgia Rule 391-3-1-.02(7) in accordance with the application submitted pursuant to that rule. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action.  
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(1)]
- 7.1.2 Approval to construct source or modification as defined in Application No. 28503 shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18- month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date. For purposes of this Permit, the definition of “commence” is given in 40 CFR 52.21(b)(9).  
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(2)]
- 7.1.3 The Permittee shall notify the Division in writing within 15 days after commencing construction. The notification should document what activities constituting “commencing construction” have been performed and the date on which they occurred
- 7.1.4 The Permittee shall notify the Division in writing within 15 days after startup of operations of any permitted emission unit.
- 7.1.5 The Permittee shall submit a completed Part 70 Operating Permit application to the Division in the approved format within 12 months after the initial startup of the facility.



**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**PART 8.0 GENERAL PROVISIONS**

**8.1 Modifications**

- 8.1.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.  
[391-3-1-.03(1) through (8)]

**8.2 Circumvention**

**State Only Enforceable Condition.**

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

**8.3 Other General Provisions**

- 8.3.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.  
[391-3-1-.02(2)(a)10]

**State of Georgia**  
**Department of Natural Resources**  
**Environmental Protection Division**

Hyundai Motor Group Metaplant America, LLC

Permit No.: 3711-029-0015-P-01-0

**State Only Enforceable Condition.**

- 8.3.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.  
[ 391-3-1-.02(2)(a)1]
- 8.3.3 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.
- 8.3.4 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."
- 8.3.5 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.3.6 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director.  
[391-3-1-.03(4)]
- 8.3.7 In VOC emission compliance determination(s) involving the exclusion of water presented, organic compounds not defined as VOC's, i.e. "exempt compounds/solvents", shall be treated as water.  
[391-3-1-.02(2)(a)6(iii)]
- 8.3.8 Unless specifically defined in this permit, terms in this permit shall be defined by 40 CFR 63, 40 CFR 60, and the Georgia Rules for Air Quality Control 391-3-1 as applicable.