

Alabama Department of Environmental Management
adem.alabama.gov

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Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

October 30, 2020

Alex Reeder
Hyundai Motor Manufacturing Alabama, LLC
700 Hyundai Boulevard
Montgomery, AL 36105

Facility Number: 209-0090

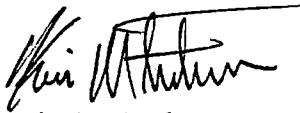
Dear Mr. Reeder:

Thank you for Hyundai Motor Manufacturing's VOC/HAP Emissions Summary Report for the past 12-month rolling total reporting period. It was noted that Hyundai Motor Manufacturing had emissions of 354 tons of VOCs for the past 12-month period. It was also noted that the BACT, NSPS, and MACT 112(g) numbers reported were below the required maximum limits.

Please be reminded that your next Annual Compliance Certification is due no later than April 4, 2021.

This report was received on October 27, 2020, and was due by October 30, 2020. Your next quarterly emissions report is due by January 30, 2021. If you have any questions, please contact me in Montgomery at (334) 270-5652.

Sincerely,



Kevin M. Fulmer
Chemical Branch
Air Division

KMF: kmf





Hyundai Motor Manufacturing Alabama, LLC
700 Hyundai Boulevard, Montgomery, AL 36105
TEL: 334-387-8000
www.hmmausa.com

RECEIVED

OCT 27 2020

ADEM

Mr. Kevin Fulmer
Alabama Department of Environmental Management
Air Division
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2400

RE: 3rd Quarter 2020 Title V Permit Reports for Hyundai Motor Manufacturing Alabama, LLC (HMMA)

Delivery Method: HAND DELIVERY

RECEIVED

October 26, 2020

OCT 27 2020

Dear Mr. Fulmer,

ADEMAIR DIVISION

As per HMMA Title V Permit # 209-0090, please find attached the following reports for the 3rd quarter of 2020:

- Quantity of VOCs in Coatings Applied by the Coating Areas
- Total Quantity of VOCs Released to Atmosphere by Coating Processes (monthly)
- Monthly Production Total and Rolling 12-Month Production Total
- Certification of Compliance for Title V permit Monitoring Requirements
- Quantity of VOC content by weight and percent by volume of material containing VOCs
- Total Quantity of VOC Emissions each month
- Quantity of HAP content by weight and percent by volume of material containing HAPs
- Total Quantity of HAP Emissions each month

Due to the COVID-19 pandemic, HMMA was forced to postpone destruction efficiency compliance testing for RTO-1, originally scheduled for April 13-15, 2020. ADEM was first made aware of this delay on March 30, 2020 via email to Kevin Fulmer as soon as the situation became clearer. When it was determined that HMMA would not be able to meet the testing deadline of May 23, 2020, a request for a deadline extension was sent via email to Kevin Fulmer on April 29, 2020. Destruction efficiency compliance testing for RTO-1 was conducted on August 3-5, 2020. HMMA did not meet the compliance threshold of 95% destruction efficiency, as detailed in the report submitted to ADEM on September 2, 2020. Beginning in September, HMMA will use a destruction efficiency of 92.6%, per ADEM's letter dated September 17, 2020.



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Furthermore, as detailed in the report to ADEM submitted on October 21, 2020, HMMA had one instance of noncompliance for visible emissions from Paint Shop stack EC-2 (E-Coat Oven Exhaust) on August 5, 2020, which occurred in the presence of Kevin Fulmer during his inspection while RTO destruction efficiency testing was being conducted. This issue was addressed within 24 hours of observation; however, at this time, intermittent visible emissions of 0-5% are still being observed coming from EC-2. HMMA's current plan to address this issue is to replace the entire outlet damper on the EC-2 stack. This work is scheduled to occur during Winter Shutdown. Additionally, the filter media bricks on RTO-1 are also being replaced during this time, which should alleviate the backpressure that might be causing these visible emissions.

Lastly, as discussed in the email and phone correspondences between HMMA's Environmental Team and ADEM personnel, an extensive investigation was conducted after the first odor complaints were received via email from Kevin Fulmer on September 18, 2020. HMMA personnel were unable to conclusively detect an unusual smell or ascertain the source(s) of the nuisance smell mentioned in the complaints received by ADEM. The investigation is still ongoing and will continue in order to potentially prevent further nuisance odor concerns, but at this time, HMMA asserts continuous compliance with regard to General Provisos 17 in Air Permit # 209-0090.

For further assistance, please feel free to contact me at (334) 387-8818.

Sincerely,

A handwritten signature in black ink that reads 'Alex Reeder'.

Alex Reeder
Air Specialist
Environmental Team, EHS Department
Hyundai Motor Manufacturing Alabama, LLC



HMMA QUARTERLY VOC EMISSIONS REPORT
3rd Quarter 2020

Jul-20

Aug-20

Sep-20

Summary Report for RTO-1, per Operating Permit 209-0090 Summary No.1 Section 5-(6)

	Total	RTO-1	Total	RTO-1	Total	RTO-1
(A) Total VOCs in coatings, as applied (lb)						
E-coat	7,052		6,518		10,244	
Primer	13,704		15,272		15,964	
Topcoat	78,057		88,590		93,783	
Other Operations	14,146		16,185		16,899	
(B) VOCs emitted without controls (lb/month) ¹						
E-coat		0		0		0
Primer		0		0		0
Topcoat		0		0		0
Total Time in By-pass (minutes)		0		0		0
(C) VOCs vented to RTO-1 by process operation (lb)						
E-coat		6,703		6,196		9,738
Primer		9,282		10,238		10,685
Topcoat		62,549		71,299		74,954
Other Operations		1,693		1,936		2,021
(D) Estimated Average Destruction Efficiency of RTO-1		99.60%		99.60%		92.60%
(E) VOC exhausted to atmosphere by RTO-1 (lb/month)		321		359		7,207
(F) Periods of coating operations where temperature is below 3-hour average compliance temperature ²						
Date and Time	None	None	None	None	None	None
(G) Total quantity of VOCs released into the atmosphere by each coating process and the Oven Exhaust RTO-1 (lb/month)		33,053		37,256		46,700
Cumulative 12-month Rolling Total of VOCs (lb)		367,831		363,341		372,425

¹VOC emissions that normally pass through the RTO for control are instead vented without control during upset/malfunction.

²The circumstances of 3-hour temperature deviations will be listed here, if any occurred.

Note: Due to the COVID-19 pandemic, HMMA was forced to postpone destruction efficiency compliance testing for RTO-1, originally scheduled for April 13-15, 2020. ADEM was first made aware of this delay on March 30, 2020 via email to Kevin Fulmer as soon as the situation became clearer. When it was determined that HMMA would not be able to meet the testing deadline of May 23, 2020, a request for a deadline extension was sent via email to Kevin Fulmer on April 29, 2020. Destruction efficiency compliance testing for RTO-1 was conducted on August 3-5, 2020. HMMA did not meet the compliance threshold of 95% destruction efficiency, as detailed in the report submitted to ADEM on September 2, 2020. Beginning in September, HMMA will use a destruction efficiency of 92.6%, per ADEM's letter dated September 17, 2020.

Summary Report for Engine Test Dynamometer, per Operating Permit 209-0090 Summary No. 008 Section 5-(5)

Periods of engine Dyno testing operations where temperature is below 3-run average temperature at which compliance is demonstrated during the recent performance test	¹ ES-19	² ES-17	¹ ES-19	² ES-17	¹ ES-19	² ES-17
Date and time	None	None	None	None	None	None

¹ ES-19: N/A

² ES-17: N/A

Prepared by: Alex Reeder
Air Specialist, Environmental, Hyundai Motor Manufacturing Alabama, LLC

Signature: Alex Reeder

Date: 10/26/2020

Certification of truth, accuracy, and completeness: I certify that based on information and belief formed after reasonable inquiry, that the statements and information in this document are true, accurate, and complete. There were no deviations from the emission limitations, operating limits, applicable work practices during the reporting period except as noted above.

Certified by: Robert Burns
Vice President of HR & Admin
Hyundai Motor Manufacturing Alabama, LLC

Signature: Robert Burns

Date: Oct. 26, 2020



NSPS SEMIANNUAL CERTIFICATION OF COMPLIANCE
3rd Quarter 2020

QUARTERLY REPORTING OF NSPS DEVIATIONS

40 CFR 60.395(b) [NSPS Subpart MM] requires that the site identify, record, and submit a report every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted exceeds the applicable NSPS limit. If no exceedances occur, the site must submit a report stating this semi-annually.

For the period of July 1, 2020 - September 30, 2020, no exceedances of the applicable NSPS limits of 1.34 lb/gacs for E-coat, 11.68 lb/gacs for Primer/Surfacer and Sealer/Deadener, and 12.27 lb/gacs for Topcoat and Clearcoat occurred.

I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Robert Burns
Robert Burns, Vice President of HR & Admin, Hyundai Motor Manufacturing Alabama, LLC
Date Oct. 26, 2020

Month - Year	Total Units	12-month Rolling Total Units	12-month Rolling Total Permit Limit
Jul-20	22,400	265,357	420,000
Aug-20	32,700	266,057	
Sep-20	32,000	268,957	



CERTIFICATION OF COMPLIANCE FOR TITLE V PERMIT (209-0090) MONITORING REQUIREMENTS
3rd Quarter 2020

QUARTERLY REPORTING OF MONITORING REQUIREMENT DEVIATIONS

HMMA Title V Permit (209-0090) General Permit Provisions 21: (a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9).

For the period of July 1, 2020 - September 30, 2020, no monitoring deviations occurred for monthly checklist for Paint Shop work practices, and records of engine usage for emergency generators. See notes 1-4 below for ES-19 CTO, ES-17 CTO, HW-1 Boiler, and HW-2 Boiler natural gas fuel usage. See notes 5-7 below for deviations in RTO-1 destruction efficiency and visible emissions, as well as a note on the nuisance odor complaints from September.

- 1 ES-19: N/A
- 2 ES-17: N/A
- 3 HW-1: N/A
- 4 HW-2: N/A

5 Due to the COVID-19 pandemic, HMMA was forced to postpone destruction efficiency compliance testing for RTO-1, originally scheduled for April 13-15, 2020. ADEM was first made aware of this delay on March 30, 2020 via email to Kevin Fulmer as soon as the situation became clearer. When it was determined that HMMA would not be able to meet the testing deadline of May 23, 2020, a request for a deadline extension was sent via email to Kevin Fulmer on April 29, 2020. Destruction efficiency compliance testing for RTO-1 was conducted on August 3-5, 2020. HMMA did not meet the compliance threshold of 95% destruction efficiency, as detailed in the report submitted to ADEM on September 2, 2020. Beginning in September, HMMA will use a destruction efficiency of 92.6%, per ADEM's letter dated September 17, 2020.

6 As detailed in the report to ADEM submitted on October 21, 2020, HMMA had one instance of noncompliance for visible emissions from Paint Shop stack EC-2 (E-Coat Oven Exhaust) on August 5, 2020, which occurred in the presence of Kevin Fulmer during his inspection while RTO destruction efficiency testing was being conducted. This issue was addressed within 24 hours of observation; however, at this time, intermittent visible emissions of 0-5% are still being observed coming from EC-2. HMMA's current plan to address this issue is to replace the entire outlet damper on the EC-2 stack. This work is scheduled to occur during Winter Shutdown. Additionally, the filter media bricks on RTO-1 are also being replaced during this time, which should alleviate the backpressure that might be causing these visible emissions.

7 As discussed in the email and phone correspondences between HMMA's Environmental Team and ADEM personnel, an extensive investigation was conducted after the first odor complaints were received via email from Kevin Fulmer on September 18, 2020. HMMA personnel were unable to conclusively detect an unusual smell or ascertain the source(s) of the nuisance smell mentioned in the complaints received by ADEM. The investigation is still ongoing and will continue in order to potentially prevent further nuisance odor concerns, but at this time, HMMA asserts continuous compliance with regard to General Provisions 17 in Air Permit # 209-0090.

I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Robert P. Burns
Robert Burns, Vice President of HR & Admin, Hyundai Motor Manufacturing Alabama, LLC

Oct 26, 2020
Date



HMMA QUARTERLY VOC EMISSIONS SUMMARY
3rd Quarter 2020

Pounds of VOCs Emitted			Tons of VOCs Emitted			Tons of VOCs Emitted 12-month Rolling Total		
Jul-20	Aug-20	Sep-20	Jul-20	Aug-20	Sep-20	Jul-20	Aug-20	Sep-20
61,928	63,055	72,532	30.96	31.53	36.27	362	358	354

	Calculated lb/gal ACS			BACT Limit (lb/gal ACS)
	Jul-20	Aug-20	Sep-20	
Primecoat: E-coat	0.03	0.02	0.07	0.13
Primer/Surfacer Coating Line	1.14	1.15	1.32	4.10
Topcoat & Clearcoat	2.26	2.19	2.88	5.20
RPP/RPS	0.71	0.71	0.72	2.39

	Tons of VOCs Emitted 12-month Rolling Total			BACT Limit (TPY)
	Jul-20	Aug-20	Sep-20	
Cleanup/Purge/Flushing Solvents	47.23	47.33	47.14	150

	Calculated lb/gal ACS			BACT Limit (lb/gal ACS)
	Jul-20	Aug-20	Sep-20	
Sealer	0.14	0.14	0.14	0.30
Deadener (Including Liquid Applied Sound Deadener)	0.24	0.24	0.24	0.30
Blackout/Extra Work Booth	**n/a	**n/a	**n/a	1.00
Cavity Wax Booth	0.24	0.24	0.24	1.20
Underbody Wax Booth	0.00	0.00	0.00	1.20

** Blackout paint not used

	Calculated lb/gal ACS			NSPS Limit (lb/gal ACS)
	Jul-20	Aug-20	Sep-20	
Primecoat: E-coat	0.03	0.02	0.07	1.34
Guidecoat: Primer/Surfacer + Sealer Deadener	0.12	0.12	0.13	11.68
Topcoat: Basecoat + Clearcoat	2.26	2.19	2.88	12.27

Prepared by: Alex Reeder
Air Specialist, Environmental, Hyundai Motor Manufacturing Alabama, LLC

Signature: Alex Reeder

Date: 10/26/2020

Certification of truth, accuracy, and completeness: I certify that based on information and belief formed after reasonable inquiry, that the statements and information in this document are true, accurate, and complete. There were no deviations from the emission limitations, operating limits, applicable work practices during the reporting period.

Certified by: Robert Burns
Vice President of HR & Admin
Hyundai Motor Manufacturing Alabama, LLC

Signature: Robert Burns

Date: Oct 26, 2020



HMMA QUARTERLY HAP EMISSIONS SUMMARY
3rd Quarter 2020

Pounds of HAPs Emitted			Tons of HAPs Emitted			Tons of HAPs Emitted 12-month Rolling Total		
Apr-20	May-20	Jun-20	Apr-20	May-20	Jun-20	Apr-20	May-20	Jun-20
1,782	2,460	2,451	0.89	1.23	1.23	13.76	13.59	13.38

MACT 112g Compliance					
	Calculated lb/gal ACS			MACT Limit (lb/gal ACS)	
	Apr-20	May-20	Jun-20		
Blackout Coatings	n/a	n/a	n/a	0.90	** Blackout paint not used
Underbody Wax	0.00	0.00	0.00	0.90	
Cavity Wax	0.00	0.00	0.00	0.90	
Combined Ecoat, Primer, Topcoat, Final Repair, Glass Primer, and Glass Adhesive	0.07	0.07	0.04	0.30	
Average HAPs/lb of Deadener Material	0.0000	0.0000	0.0000	0.01	
Average HAPs/lb of Adhesive/Sealer Material (Excluding Glass Bonding Systems)	0.0000	0.0000	0.0000	0.01	
Tons of HAPs Emitted 12-month Rolling Total				MACT Limit (TPY)	
	Apr-20	May-20	Jun-20		
Miscellaneous Assembly Materials	4.98	4.82	4.65	13.00	
Clean/Purge/Flushing Solvents	1.85	2.19	2.24	36.00	
Monthly Average HAPs Percent by Weight				MACT Limit (% Weight)	
	Apr-20	May-20	Jun-20		
Sealers/Adhesives	0.000%	0.000%	0.000%	1.00%	
Deadeners	0.000%	0.000%	0.000%	1.00%	
Glass Bonding Adhesives	0.000%	0.000%	0.000%	1.00%	
Welding Sealers/Adhesives	0.000%	0.000%	0.000%	1.00%	

Prepared by: Alex Reeder
Air Specialist, Environmental, Hyundai Motor Manufacturing Alabama, LLC

Signature: Alex Reeder

Date: 10/26/2020

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