



Louisville Metro Air Pollution Control District
 701 West Ormsby Avenue, Suite 303
 Louisville, Kentucky 40203-3137



March 7, 2019

Title V Statement of Basis

Owner: Ford Motor Company

Source: Ford Motor Company - Kentucky Truck Plant

Plant Location: 3001 Chamberlain Ln., Louisville, Kentucky 40241

Date Application Received: 11/28/2016

Date Admin Complete: 12/05/2017

Date of Draft Permit: 12/15/2018

Date of Proposed Permit: 12/15/2018

District Engineer: Shannon Hosey

Permit No: O-0073-18-V

Plant ID: 0073

SIC Code: 3711

NAICS: 336211

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

This is the permit renewal which incorporates the PSD construction permit TV-13-1016(R1) and updates STAR requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter less than 10 microns (PM₁₀), and is unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}). Jefferson County is classified as a nonattainment area for ozone (O₃). This facility is located in the portion of Jefferson County that is an attainment area for sulfur dioxide (SO₂).

Application Type/Permit Activity:

- Initial Issuance
- Permit Revision
 - Administrative
 - Minor
 - Significant
- Permit Renewal

Compliance Summary:

- Compliance certification signed
- Compliance schedule included
- Source is out of compliance
- Source is operating in compliance

I. Source Information

1. **Product Description:** Ford Motor Company - Kentucky Truck Plant manufactures automobiles, light- and medium-duty trucks and paints them in one of the two paint shops.
2. **Process Description:** Once the automobile, light- and medium-duty truck bodies are manufactured in a body shop, then these bodies are transferred to one of the two separate paint shops, which are the existing (KTP Super Duty) and the new (KTP SUV). In the paint shops corrosion protection and paint applications are applied. From the paint shop, the bodies are shipped to the Final Assembly area.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent to this facility.
4. **Emission Unit Summary:**

Emission Unit	Equipment Description
U-00 Super Duty	Natural Gas Boilers
U-11 Super Duty	Volatile Organic Liquid Storage Tanks
U-12 Super Duty	Plantwide Product Fueling and Plant Vehicle Refueling
U-15 Super Duty	Pretreatment System
U-16 Super Duty	E-Coat Operation
U-17 Super Duty	Sealer
U-18 Super Duty	Guidecoat Operation
U-19/23 Super Duty	Topcoat/Final Repair Operations
U-20 Super Duty	Black-Out and Wax
U-22 Super Duty	Cleaning Operations
U-28 Super Duty	Aluminum Scrap System
U-30/U-33 Super Duty	Two (2) Windshield Installation Operations
U-34 Super Duty	Natural Gas-Fired Combustion Equipment - Non-Boiler
U-35 Super Duty	Emergency Generators
U-50- Pretreatment System SUV	Receives white-metal bodies from Body shop, cleans the metal with detergent solutions, applies a pretreatment conversion coating in a large dip tank, and rinses excess material from the body prior to e-coat.
U-51 – E-Coat System SUV	Receives bodies from pretreatment and applies an electro-deposited anti-corrosion coating to the body in a large dip tank. Rinses excess material from the body and sends it to the e-coat oven to be cured. Exhaust from the e-coat oven is directed to an RTO for VOC control. After the oven, the surface is lightly sanded to remove small surface defects. Particulates from this operation are controlled by dry air filters in the exhaust plenum.
U-53 – Sealer SUV	Body seams are closed by manual application of a variety of sealing materials and the sealer is partially cured in the sealer-gel oven. VOCs are emitted from these operations, but they are uncontrolled.
U-54 – PVC Antichip SUV	A PVC material is robotically sprayed on the lower rocker panel of the vehicle to prevent body damage from road debris. Particulate emissions are controlled with dry air filters.

Emission Unit	Equipment Description
U-55 – 3-Wet System Guidecoat SUV	This is the first section of the paint spraybooths where a guidecoat is applied to provide a smooth surface and promote adhesion between the e-coat and topcoat materials and applied robotically. The application is 100% robotic, however a manual application station is provided to add backup material when required or take over for robot malfunctions. Air is recirculated within this portion of the booth, with a portion bled off to be exhausted through a carbon adsorption system and, ultimately, a regenerative thermal oxidizer. Particulate control is through an air-suspended limestone bed under the booth.
U-56 – 3-Wet Topcoat System SUV	This is the second section of the paint spraybooths where a colored base-coat and clear or tinted clearcoat are applied over the still wet guidecoat. The application is 100% robotic, however a manual application station is provided after both the basecoat and clearcoat sections to add backup material when required or take over for robot malfunctions. Air is recirculated within this portion of the booth, with a portion bled off to be exhausted through a carbon adsorption system and, ultimately, a regenerative thermal oxidizer. Particulate control is through an air-suspended limestone bed under the booth. After the paint is applied, the vehicle body is cured in the paint oven. Exhaust from this oven is directed to the same RTO as that used to abate the e-coat oven. The “Paint Kitchen” where paint is stored, cut with solvents to the proper viscosity, and circulated to the spraybooths is also part of this emission unit. The spot repair area, where small paint defects found after the painting process are corrected, is after the oven and also included in this emission unit.
U-58 – Blackout SUV	A black coating material is sprayed into the rear wheel wells of the body for cosmetic purposes. Particulate emissions are controlled by dry plenum air filters.
U-59 – Purge and Clean SUV	This emission unit covers the processes of equipment purging of residual paint between color changes and cleaning of the equipment. Storage of the materials used to complete these tasks is covered in another emission unit.

5. **Fugitive Sources:** Fugitive emissions of VOCs and HAPs from Emission Points subject to 40 CFR Part 60 Subpart IIII- National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks and APCD regulations 7.25 and 7.59.

6. **Permit Revisions:**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	150-97-TV	01/31/2000	11/21/1999	Initial	Entire Permit	Initial Permit Issuance
R1	150-97-TV (R1)	04/17/2012	02/22/2012	Renewal	Entire Permit	5 Year Renewal; Incorporate PAL, STAR TAC

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
						requirements, RO change, construction permits 63-04-C, 65-04-C, 118-04-C, 119-04-C, 210-05-C, 211-05-C, 157-07-C, 158-07-C, 479-08-C, 567-08-C and 583-08-C
N/A	O-0073-18-V	03/07/2019	12/15/2018	Renewal	Entire Permit	Permit Renewal; Incorporate PSD construction permit TV-13-1016(R1), update STAR requirements, removed Emission Unit U31, Bedliner Coating Booth, since it is no longer in service, and adding CAM Plan

7. Construction Permit History:

Permit No.	Issue Date	Description
TV-13-1016(R1)	02/25/2015	A new paint shop for manufacturing automobiles and light-duty trucks. The facilities consist of a new pretreatment/e-coat system and associated curing oven and VOC abatement equipment; sealer application deck and sealer gel oven; 3-Wet spray booth for robotic application of guidecoat and topcoat materials, with provisions for backup manual application and associated curing oven, particulate control and VOC abatement equipment; paint kitchen for mixing and storing the paint materials; paint finish repair facilities; and wheel well blackout spray booth.

8. Permit Renewal-Related Documents:

Document Number	Date Received	Description
80649	11/28/2016	TV Renewal Application
74914	1/21/2016	AP-100A to incorporate construction permit into operating permit
69389	2/13/2015	AP-100A one year extension of construction permit TV-13-1016

9. Emission Summary:

Pollutant	Actual Emissions (tons/year) 2016 Data	Pollutant that triggered Major Source Status (based on PTE)
VOC	807.10	Yes
CO	71.79	No
NO _x	59.695	No
SO ₂	0.54	No
PM	20.14	No
PM ₁₀	19.89	No
PM _{2.5}	17.891	No
GHG	N/A	No
Single HAP > 1 tpy	Glycol Ethers 6.6 Cumene 2.24 Ethylbenzene 1.05 Methanol 1.06 Naphthalene 1.03 Toluene 2.12 Xylene 5.21	Yes
Total HAPs	21.98	Yes

10. Plantwide Applicability Limits:

Pollutant	Limit (Tons/12-month Consecutive Months)
VOC	1344.75
PM	50.5
PM ₁₀ *	50.5
PM _{2.5}	45.05
NO _x	99.0
SO ₂	39.58
CO	180.66
GHG CO ₂ e	180,661

*The PM-10 limit is considered a limit on PM.

11. Applicable Requirements:

PSD 40 CFR 60 SIP 40 CFR 63
 NSR 40 CFR 61 District-Origin Other

12. Referenced Federal Regulations:

40 CFR 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR 60 Subpart MM National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations

40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 63 Subpart IIII	National Emission Standards for Hazardous Air Pollutants – Surface Coating of Automobile and Light Duty Trucks
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR 63, Subpart CCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

II. Regulatory Analysis

1. **Acid Rain Requirements:** Ford Motor Company - Kentucky Truck Plant is not subject to the Acid Rain Program.
2. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. Ford Motor Company - Kentucky Truck Plant does not manufacture, sell, or distribute any of the listed chemicals. The source’s use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
3. **Prevention of Accidental Releases 112(r):** Ford Motor Company - Kentucky Truck Plant does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
4. **40 CFR Part 64 Applicability Determination:** Ford Motor Company - Kentucky Truck Plant is subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*.
5. **Applicable Regulations:**

Regulation	Title	Type
1.05	Compliance with Emission Standards and Maintenance Requirements	SIP
1.18	Rule Effectiveness	SIP
2.03	Permit Requirements – Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements	SIP
2.05	Prevention of Significant Deterioration of Air Quality	SIP

Regulation	Title	Type
40 CFR 52.21	Prevention of Significant Deterioration of Air Quality	Federal
2.16	Title V Operating Permits	SIP
6.07	Standards of Performance for Existing Indirect Heat Exchangers	SIP
6.17	Standards of Performance for Existing Automobile and Truck Surface Coating Operations	SIP
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	SIP
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound	SIP
7.01	General Provisions	SIP
7.06	Standards of Performance for New Indirect Heat Exchangers	SIP
7.08	Standards of Performance for New Process Operations	SIP
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	SIP
7.15	Standards of Performance for New Process Operations	SIP
7.25	Standards of Performance for New Source Using Volatile Organic Compounds	SIP
7.59	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	SIP
5.00	Definitions	Local
5.01	General Provisions	Local
5.02	Adoption of National Emission Standards for Hazardous Air Pollutants	Local
5.14	Hazardous Air Pollutants and Source Categories	Local
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant	Local
5.21	Environmental Acceptability for Toxic Air Contaminants	Local
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant	Local
5.23	Categories of Toxic Air Contaminants	Local
40 CFR 60 Subpart A	General Provisions	Federal
40 CFR 60 Subpart MM	National Emission Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	Federal
40 CFR 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Federal
40 CFR 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Federal
40 CFR 63 Subpart A	General Provisions	Federal
40 CFR 63 Subpart IIII	National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks	Federal
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Federal
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Federal

Regulation	Title	Type
40 CFR 63, Subpart CCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	Federal

6. Basis of Regulation Applicability

Regulation	Title
1.05	Compliance with Emission Standards and Maintenance Requirements
1.18	Applies to sources in Regulation 6.43, sources with actual annual VOC emissions of 50 tons or more, and to sources with affected facilities subject to other VOC control requirements in Regulations 6 or 7
2.03	Permit Requirements – Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.05	Prevention of Significant Deterioration of Air Quality
40 CFR 52.21	Prevention of Significant Deterioration of Air Quality
2.16	Title V Source
6.07	Applies to boilers with heat generating capacities greater than 1 MMBtu/hr, modified before April 9, 1972, for PM and SO ₂ .
6.17	Applies to each existing auto and truck manufacturing facility which was in being or had a construction permit issued by the District before June 13, 1979.
6.18	Applies to cold cleaners.
6.42	Applies to major nitrogen oxides emitting facilities.
7.01	Establishes general requirements for new affected facilities.
7.06	Applies to each indirect heat exchanger having input capacity of more than one million BTU per hour commenced after September 1, 1976.
7.08	Establishes requirements for new processes that are subject to PM standards and were installed after September 1, 1976.
7.12	Applies to VOC storage tanks greater than 250 gallon capacity which were installed after April 19, 1972.
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)
7.25	Applies to each existing auto and truck manufacturing facility which was in being or had a construction permit issued by the District before June 13, 1979
7.59	Applies to the glass installation operation for VOC emissions, installed after September 1, 1976.
5.00, 5.01, 5.20, 5.21, 5.22, 5.23	Establish the requirements for Environmental Acceptability for TACs.
5.14	Establishes the hazardous air pollutants regulated by the District and the major and minor source categories of HAPs.
40 CFR 60 Subpart A	General Provisions
40 CFR 60 Subpart MM	Applies to the following affected facilities in an automobile or light-duty truck assembly plant: each prime coat operation, each guide coat operation, and each topcoat operation
40 CFR 60 Subpart Dc	Applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units

Regulation	Title
	per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h)
40 CFR Part 60 IIII	Applies to stationary CI internal combustion engines that commence construction after July 11, 2005.
40 CFR 63 Subpart A	General Provisions
40 CFR 63 Subpart IIII	Establishes national emission standards for hazardous air pollutants (NESHAP) for facilities which surface coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks.
40 CFR 63 Subpart ZZZZ	Establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.
40 CFR 63 Subpart DDDDD	Establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters.
40 CFR 63, Subpart CCCCC	Establishes national emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF).

a. **Plantwide STAR Limits**

i. **TAC**

- a) Regulations 5.00, 5.01, 5.20, 5.21, 5.22 and 5.23 (STAR Program) establish requirements for environmental acceptability of the emission of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards.
- b) The facility submitted an updated TAC Environmental Acceptability (EA) Demonstration to the District in December 2017 and February 2018. Compliance with the STAR EA Goals was demonstrated in the source’s EA Demonstrations. Based on AERMOD air modeling, the maximum off-site R_{NC} for all process/process equipment is less than 1.0 and the maximum off-site R_C is less than 3.8 for the plantwide cumulative risk, the source has demonstrated compliance with the EA Goals for each TAC.

TAC	Sum of Concentrations	BAC _C	BAC _{NC}	Risk	HQ
Toluene	1.23	–	5000	–	0.0002
Ethylene glycol monobutyl ether acetate (EGMbEA)	114	–	17,600	–	0.0065
Diethylene glycol monobutyl ether	0.0228	–	20	–	0.0011
Xylene	6.1	–	100	–	0.061
Aluminum	25.2	–	50	–	0.504

TAC	Sum of Concentrations	BAC _C	BAC _{NC}	Risk	HQ
Naphthalene	0.0271	0.029	3	0.934	0.009
1,2,4-trimethylbenzene	42.9	-	50	-	0.857
Ethylbenzene	0.218	0.40	1000	0.545	0.00022
Cumene ¹	0.0423	0.10	400	0.423	0.00011
			Sum	1.902	1.498
			EA Goal		3.8

b. **Plantwide Limits**

Standards

- i. See Plantwide Applicability Limits Table.
- ii. The company has taken a limit of 99 tons for NO_x during any consecutive 12-month period in order to stay below the NO_x RACT applicability threshold.

c. **Emission Unit U-00 – Boilers**

i. **Equipment:**

Emission Point	Description	Install Date	Applicable Regulation
E-165	Three (3) natural gas boilers less than 10 MM Btu/hr each (Fire Pump House)	1995	STAR*, 7.06, 6.42, 40 CFR 63 Subpart DDDDD
E-162	Two (2) Cleaver-Brooks Admin boilers (No. 1 and 2); rated at 14.65 MM Btu/hr each; natural gas-fired with propane backup.	1968	STAR*, 6.07, 6.42, 40 CFR 63 Subpart DDDDD
E-161	Four (4) 29.29 MMBtu/hr each Cleaver-Brooks boilers (no. 8 -11), natural gas-fired with propane backup.	1993	STAR*, 7.06, 6.42, 40 CFR 60 Subpart Dc, 40 CFR 63 Subpart DDDDD
E-201	Two hot water generators rated 5.103 MMBtu/hr each	-	STAR*, 7.06 ²
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

1 Modeling was performed at 2,100 hours of downtime/operation without control.

2 Federal regulation 40 CFR 63, subpart DDDDD regulates industrial boilers and process water heaters. However, §63.7575 exempts boilers and water heaters with maximum rated heat input of less than 1.6 MMBtu/hr.

ii. **Standards/Operating Limits**

a. **PM**

The emission standard for PM is determined in accordance with Regulation 6.07, section 3.1 and 7.06, section 4.1.4.

b. **Opacity**

Regulation 6.07, section 3.2 and 7.06, section 5.1.1 establishes an opacity standard of less than 20%.

c. **SO₂**

i. For Emission Point E-162, the emission standard for SO₂ is determined in accordance with Regulation 6.07, section 4.1.

ii. For Emission Points E-161, E-165 and E-201, the emission standard for SO₂ is determined in accordance with Regulation 7.06, section 5.1.1.

iii. Emission Point E-161 is subject to 40 CFR 60, Subpart Dc. However, there is no SO₂ emission standard for natural gas fired boilers in Subpart Dc.

d. **NO_x**

Per Regulation 6.42, the owner or operator shall not allow the NO_x emissions to exceed 99 tons during any consecutive 12-month period in order to avoid NO_x RACT.

e. **HAP**

Emission Points E-161, E-162 and E-165 are subject to 40 CFR 63 Subpart DDDDD.

d. **Emission Unit U-11 – Volatile Organic Liquid Storage Tanks**

i. **Equipment**

Emission Point	Description	Install Date	Applicable Regulation
E-39	11,600 gallon Spill Containment Tank #3	1990	N/A
E-44	20,000 gallon Diesel Fuel Tank # 8	1990	7.12
E-45	20,000 gallon Diesel Fuel Tank # 9	1990	7.12
E-46	20,000 gallon Diesel Fuel Tank # 10	1990	7.12
E-47	20,000 gallon Diesel Fuel Tank # 11	1990	7.12
E-50	6,000 gallon Brake Fluid Tank # 14	1990	STAR*, 7.12
E-52	6,000 gallon Used Oil Tank # 15	1990	7.12
E-53	20,000 gallon Transmission Fluid Tank # 17	1990	STAR*, 7.12
E-54	20,000 gallon Transmission Fluid Tank # 18	1990	STAR*, 7.12
E-58	20,000 gallon Antifreeze Tank # 22	1993	STAR*, 7.12
E-60	8,000 gallon Windshield Washer Fluid Tank # 23	1993	STAR* 7.12, 40 CFR 63 Subpart EEEE

Emission Point	Description	Install Date	Applicable Regulation
E-63	6,000 gallon Sulfuric Acid DI Water Tank # 25	1968	STAR*
E-64	6,000 gallon Caustic Soda DI Water Tank # 26	1968	N/A
E-74	6,000 gallon Sulfuric Acid Wastewater Treatment Tank # 37	1988	STAR*
E-75	6,000 gallon Caustic Soda Wastewater Treatment Tank # 38	1988	N/A
E-78	10,000 gallon Waterbased Purge Tank # 76	1994	STAR*, 7.12
E-79	10,000 gallon Waterbased Purge Tank # 77	1994	STAR*, 7.12
E-80	10,000 gallon Solvent Purge Tank #74	1994	STAR*, 7.12
E-81	10,000 gallon Solvent Purge Tank #75	1994	STAR*, 7.12
E-112, E-113	20,000 gallon E-Coat Wastewater Treatment (2 tanks) Tank # 40	1994	STAR*
E-114, E-115, E-116, E-117, E-118	150,000 gallon Wastewater Treatment (5 tanks) Tank # 41	1986-1994	STAR*
E-119, E-120, E-121, E-122	20,000 gallon Sludge Decant (4 tanks) Tank # 42	1986-1994	STAR*
E-125	6,000 gallon Car Wash Tank # 62	1994	N/A
E-126	6,000 gallon Pretreatment Dip Tank # 63	1994	STAR*
E-127	6,000 gallon Pretreatment Dip Tank # 64	1994	STAR*
E-128	6,000 gallon Pretreatment Dip Tank # 65	1994	STAR*
E-131	4,000 gallon Grate Coating Tank # 68	1994	STAR*, 7.12
E-133	3,000 gallon E-Coat Wastewater Treatment Tank # 71	1994	STAR*
E-134	1,000 gallon Used Oil Tank # 70	1994	7.12
E-159	Two (2) 5,000 gallon Tanks	-	STAR*, 7.12
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**

VOC

Regulation 7.12, section 3.3 requires submerged fill if the materials have an as stored vapor pressure of 1.5 psia or greater. Regulation 7.12 applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.

e. **Emission Unit U-12 – Plantwide Product Fueling and Plant Vehicle Refueling**

i. **Equipment**

Emission Point	Description	Install Date	Applicable Regulation
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Emission Point	Description	Install Date	Applicable Regulation
E-37	20,000 gallon Gasoline Tank T1	1990	STAR*, 40 CFR 63, Subpart CCCCCC, 7.15
E-38	20,000 gallon Gasoline Tank T2	1990	
E-82	Two (2) Fueling Stations	1969, 1990	-
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**

VOC

Regulation 7.15 requires that storage tanks be equipped with the following:

- a. A submerged fill pipe;
- b. If equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
- c. Vent line restrictions on the affected facility; and
- d. Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses.

f. **Emission Unit U-15 – Pretreatment System**

i. **Equipment**

Emission Point	Description	Install Date	Applicable Regulation
E-86	Pretreat	1994	STAR*
E-137	Pretreatment Dump Tank	1994	STAR*
E-138	Pretreatment Dump Tank	1994	STAR*
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

g. **Emission Unit U-16 – E-Coat Operation**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-87	E-Coat Dip Tank	6.17, 7.01, 40 CFR 60 Subpart MM, 40 CFR 63 Subpart III	C-29/(C-32 for booth only)
	High Temperature Cure Oven		
E-88	E-Coat Scuff Booth	7.08	C-30
E-129	12,700 gallon E-Coat Resin Tank # 66	7.12	N/A
E-135	90,000 gallon E-Coat Dump Tank	7.12	N/A
E-136	90,000 gallon E-Coat Dump Tank	7.12	N/A

ID	Description	Performance Indicator	Stack ID
C-29	Regenerative Thermal Oxidizer (RTO)	Temperature	S-272
C-30	Filter	N/A	S-199, S-200
C-32	Carbon Concentrator	N/A	S-273

ii. **Standards/Operating Limits**

a. **VOC**

- i. For Emission Points E-129, E-135 and E-136, Regulation 7.12 applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.
- ii. Regulation 6.17, section 3.2 sets forth the VOC limit for E-Coat coatings.
- iii. The E-Coat Operation is subject to 40 CFR 60, Subpart MM.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The E-Coat Operation is subject to 40 CFR Part 63, Subpart III.

e. **NO_x**

Per Regulation 7.08, section 4 NO_x fumes shall not exceed 300 ppm by volume expressed as NO₂. Using AP-42 emission factors for combustion of natural gas, the NO_x emission standard cannot be exceeded by any of the natural gas burners which are part of this emission point.

h. **Emission Unit U-17 – Sealer**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-89	Sealer Application and Gel Oven	7.59, 40 CFR 63 Subpart III	N/A
	Sealers and Deadeners (other than glass bonding)		
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**

a. **VOC**

Per Regulation 7.59, section 3.1.4. the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of

3.0 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.

b. HAP

The Sealer is subject to 40 CFR Part 63, Subpart IIII.

i. Emission Unit U-18 – Guidecoat Operation

i. Equipment

Emission Point	Description	Applicable Regulation	Control ID
E-89	Sealer Application and Gel Oven	STAR*, 6.17, 7.01, 7.08, 40 CFR 60 Subpart MM, 40 CFR 63 Subpart IIII	C-29,
	Sealers and Deadeners (other than glass bonding)		C-31 and C-32
E-108	Guidecoat/Topcoat Paint Kitchen		N/A
E-92	Guidecoat (Prime) Scuff Booth		C-33
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ID	Description	Performance Indicator	Stack ID
C-29	Regenerative Thermal Oxidizer (RTO)	Temperature	S-272
C-31	Water Wash	N/A	S-204 through S-211 and S-547 through S-549
C-32	Carbon Adsorber	N/A	S-273
C-33	Filter	N/A	S-220 to S-221

ii. Standards/Operating Limits

a. VOC

- i. Regulation 6.17, section 3.2 sets forth the VOC limit for coatings.
- ii. The Guidecoat Operation is subject to 40 CFR 60 Subpart MM.

b. PM

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. Opacity

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. HAP

The Guidecoat Operation is subject to 40 CFR Part 63, Subpart IIII.

j. **Emission Unit U-19/23 – Topcoat/Final Repair Operations**i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-93	Topcoat Spray Booth #1	STAR*, 6.17, 7.01, 7.08, 40 CFR 60 Subpart MM, 40 CFR 63 Subpart IIII	C-34, C-32 and C-29
E-94	Topcoat Cure Oven#1		C-29
E-95	Topcoat Scuff Booth #1		C-35
E-96	Topcoat Spray Booth #2		C-36, C-32 and C-29
E-97	Topcoat Curing Oven #2		C-29
E-98	Topcoat Scuff Booth #2		C-37
E-99	Spot Repair Area		N/A
E-103	Final Repair/Topcoat Paint Spray Booth		C-41
E-104	Final Repair/Topcoat Oven		N/A

* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

ID	Description	Performance Indicator	Stack ID
C-29	Regenerative Thermal Oxidizer (RTO)	Temperature	S-272
C-32	Carbon Concentrator	N/A	S-273
C-34	Water Wash	N/A	S-222 through S-239, S-312, S-314, S-247 through S-264, S-311 and S-313
C-35	Filter	N/A	S-245 and S-246
C-36	Water Wash	N/A	S-249 through S-256, S-261 through S-263, S-311 and S-313
C-37	Filter	N/A	S-270 and S-271

ii. **Standards/Operating Limits**a. **VOC**

- i. Regulation 6.17, section 3.2 sets forth the VOC limit for coatings.
- ii. The Topcoat/Final Repair Operations are subject to 40 CFR 60 Subpart MM.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The Topcoat/Final Repair Operations are subject to 40 CFR Part 63, Subpart IIII.

k. **Emission Unit U-20 – Black-Out and Wax**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Install Date	Control ID
E-100	Blackout Paint and Wax Spray Booth	STAR*, 7.08, 7.59, 40 CFR 63 Subpart IIII	1994	C-39
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ID	Description	Performance Indicator	Stack ID
C-39	Filter	N/A	S-275 through S-278

ii. **Standards/Operating Limits**

a. **VOC**

Per Regulation 7.59, section 3.1.4. the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.0 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The Black-Out and Wax Operation is subject to 40 CFR Part 63, Subpart IIII.

l. **Emission Unit U-22 – Cleaning Operations**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-109	Purge and Cleaning	7.25, 40 CFR 63 Subpart IIII	N/A
E-102	Cleaning Paint Pots		N/A
N/A	Solvent Metal Cleaning Equipment	6.18	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**

a. **VOC**

- 1) The source shall follow the procedure to minimize VOC emissions from purge and cleaning operations under Regulation 7.25, section 3.
- 2) For all cold solvent parts washers, the source shall comply with the standards of Regulation 6.18, sections 4.1 through 4.3.

b. HAP

The Cleaning Operation is subject to 40 CFR Part 63, Subpart IIII.

m. Emission Unit U-28 – Aluminum Scrap Shredder System

i. Equipment

Emission Point	Description	Applicable Regulation	Installation Date	Control ID
E-150	Aluminum Scrap Shredder	STAR*, 7.08	2015	C-28
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ii. Standards/Operating Limits

a. PM

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

b. Opacity

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

n. Emission Unit U-30/U-33 – Two (2) Windshield Installation Operations

i. Equipment

Emission Point	Description	Applicable Regulation	Control ID
E-160 and E-152	Glass Installation in Vehicles Using Primers, Glass Cleaners and Adhesives	STAR*, 7.25, 7.59, 40 CFR 63 Subpart IIII	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. Standards/Operating Limits

a. VOC

Per Regulation 7.59, section 3.1.2 and Regulation 7.25 the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.5 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.

b. **HAP**

The Windshield Installation Operations are subject to 40 CFR Part 63, Subpart IIII.

o. **Emission Unit U-34 – Natural Gas-Fired Combustion Equipment – Non-Boiler**i. **Equipment**

Emission Point	Description	Applicable Regulation	Install Date	Control ID
E-25	Fifteen (15) Natural Gas-Fired “Bigfoot” Heating Units (20 MMBtu/hr each)	STAR*, 6.42, 7.08	2000	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ii. **Standards/Operating Limits**a. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

b. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

c. **NO_x**

Per Regulation 6.42 the owner or operator shall not allow the NO_x emissions to exceed 99 tons during any consecutive 12-month period in order to avoid NO_x RACT.

p. **Emission Unit U-35 – Emergency Generators and Fire Pumps**i. **Equipment**

Emission Point	Description	Applicable Regulation	Install Date	Control ID
E-FP1	Emergency Diesel Fire Pump #1, John Deere 606HFC48, 305 HP	STAR*, 40 CFR 60 Subpart IIII	2014	N/A
E-FP2	Emergency Diesel Fire Pump #2, John Deere JW6H-UFAD70, 334.8 HP		2010	N/A
E-FP3	Emergency Diesel Fire Pump #3, ITT/Caterpillar 6100, 337 HP	STAR*, 40 CFR 63 Subpart ZZZZ, 40 CFR 60 Subpart IIII	2004	N/A
E-PW-1	Emergency Diesel Generator, Ford Power Products CSG-6451-5005-A, 207 HP (Assembly Building PW-1)	STAR*, 40 CFR 63 Subpart ZZZZ	2006	N/A
E-PW-2	Emergency Propane Generator, Cummins 100-3802-02, 82 HP		1984	N/A

Emission Point	Description	Applicable Regulation	Install Date	Control ID
	(PW-1)			
E-J-28	Emergency Natural Gas Generator, Ford Power Products CSG-6491-6005-A, 82 HP	STAR*, 40 CFR 63 Subpart ZZZZ	1992	N/A
E-M-37	Emergency Natural Gas Generator, Ford Power Products CSG-6491-6005-A, 82 HP		1992	N/A
E-BB-31	Emergency Natural Gas Generator, Ford Power Products LSG-8751-6005-A, 122 HP		1992	N/A
E-AB	Emergency Natural Gas Generator, Hercules Engines, Inc. G2300, 82 HP (Mechanical Room A)	STAR*, 40 CFR 63 Subpart ZZZZ	1992	1969
E-SD	Emergency Natural Gas Generator, Ford Power Products LSG-8751-6005-A, 173 HP (SD Paint)		1994	N/A
E-WWTP	Emergency Natural Gas Generator, Ford Power Products LSG-8751-6005-A, 244 HP		1992	N/A
E-MP&L	Emergency Propane Generator, Cummins GGHJ-1401892, 168	STAR*, 40 CFR 60 Subpart JJJJ	2014	N/A
E-S	Emergency Propane Generator, Cummins GGHJ-1401892, 168 (Stamping)		2014	N/A
E-NP	Emergency Propane Generator, Cummins GGHJ-1401892, 168 (New Paint)		2014	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ii. **Standards/Operating Limits**

a. **HAP**

- i. The existing Emergency Generators are subject to 40 CFR 63 Subpart ZZZZ.
- ii. The new Emergency Generators are subject to 40 CFR 63 Subpart ZZZZ, 40 CFR Part 60 Subpart IIII and 40 CFR 60 Subpart JJJJ.
- iii. The Fire Pumps are subject to 40 CFR Part 60 IIII and 40 CFR Part 63 Subpart ZZZZ.

q. **Emission Unit U-50 – Pretreatment System**i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-200	Pretreatment system, including all spray stages and dip tanks	STAR*	N/A
E-202	Two Pretreatment dump tanks (45,000 gallons each)	STAR*	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

r. **Emission Unit U-51 – E-Coat System**i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-203	E-Coat Dip Tank (55,000 gallons)	STAR*, 40 CFR 60 Subpart MM	C-50
E-204	E-Coat Oven	STAR*, 7.08	C-50
E-205	E-Coat Scuff Booth	STAR*, 7.08	C-54
E-206	E-Coat Resin Storage Tank (6,000 gallon)	STAR*, 7.12	N/A
E-207	Two (2) E-Coat Dump Tank (55,000 gallons)	STAR*, 7.12	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ID	Description	Performance Indicator	Stack ID
C-50	Oven Exhaust RTO	Chamber Temperature	S-700
C-54	Dry filter	ΔP	S-712 and S-713

ii. **Standards/Operating Limits**a. **VOC**

- i. For Emission Points E-206 and E-207, Regulation 7.12 applies due to the size of the tanks, however, since the vapor pressure as stored is less than 1.5 psia there are no applicable emission or equipment standards.
- ii. The E-Coat System is subject to 40 CFR 60, Subpart MM.

f. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

g. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

s. **Emission Unit U-53 – Sealer**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-208	Sealer Deck (multiple manual and robotic application stations)	1.09, 7.59, 40 CFR 63 Subpart III	N/A
E-209	Sealer Gel Oven	7.08	N/A
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**

a. **VOC**

Per Regulation 7.59, section 3.1.4. the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.0 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.

b. **HAP**

The Sealer is subject to 40 CFR Part 63, Subpart III.

t. **Emission Unit U-54 – PVC Antichip**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-210	PVC deck (robot applicators)	STAR*, 7.08, 7.59, 40 CFR 63 Subpart III	S-734 and S-735
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**

a. **VOC**

Per Regulation 7.59, section 3.1.4. the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.0 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The PVC Antichip is subject to 40 CFR Part 63, Subpart III.

u. **Emission Unit U-55 – Wet System Guidecoat**i. **Equipment**

Emission Point	Description	Applicable Regulation	Control ID
E-210	PVC deck (robot applicators)	STAR*, 7.08, 7.59, 40 CFR 63 Subpart IIII	S-734 and S-735
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.			

ii. **Standards/Operating Limits**a. **VOC**

Per Regulation 7.59, section 3.1.4. the source shall not cause or allow the emission of VOC from any affected facility resulting from the coating of metallic surfaces in excess of 3.0 lb VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The Wet System Guidecoat is subject to 40 CFR Part 63, Subpart IIII.

v. **Emission Unit U-56 – Wet System Topcoat**i. **Equipment**

Emission Point	Description	Applicable Regulation	Install Date	Control ID
E-212	Topcoat portion of 3-Wet Booth (Basecoat and Clearcoat)	STAR*, 6.17, 7.01, 7.08,	2015	C-50, C-51 and C-53
E-213	3-Wet Oven	40 CFR 63 Subpart IIII, 40 CFR 60 Subpart MM	2015	C-50
E-214	Heavy Metal Repair Booth	7.08	2015	C-55
E-215	Paint Kitchen (12 tanks with 80-gallon capacity, connected to two 8-inch vent headers with conservation valves and 30 tanks with 250-gallon capacity, connected to six 8-inch vent headers with conservation valves.)	7.12	2015	N/A
E-216	Spot Repair area	6.17 and	2015	N/A

Emission Point	Description	Applicable Regulation	Install Date	Control ID
		7.08		
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ID	Description	Performance Indicator	Stack ID
C-50	Oven RTO	Chamber Temperature	S-700
C-51	Booth Exhaust Concentrator	Desorption Gas Inlet Temperature	S-702
C-53	Dry booth air filtration system	ΔP	S-717 and S-718
C-55	Dry filter	ΔP	S-728

ii. **Standards/Operating Limits**

a. **VOC**

- i. The Wet System Topcoat is subject to 40 CFR 60, Subpart MM.
- ii. Regulation 6.17, section 3.2 sets forth the VOC limit for Wet System Topcoat coatings.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The Wet System Topcoat is subject to 40 CFR Part 63, Subpart IIII.

w. **Emission Unit U-58 – Blackout and Wax**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Install Date	Control ID
E-217	Blackout and Wax Booth	STAR*, 7.08, 7.25, 40 CFR 63 Subpart IIII	2015	C-56
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ID	Description	Performance Indicator	Stack ID
C-56	Dry Filter	ΔP	S-728

ii. **Standards/Operating Limits**

a. **VOC**

For miscellaneous metal coating operations with excess emissions greater than 5 tons per year, regulation 7.25

requires installation and use of Best Available Control Technology. The BACT analysis submitted by the permittee demonstrated that due to the low VOC concentration in the exhaust stream of this process there is no economical and effective method of VOC control.

b. **PM**

Regulation 7.08 sets forth PM emission limits for new processes. The emission rate is based on the mass of the material used in the process.

c. **Opacity**

Regulation 7.08, section 3.1.2 establishes an opacity standard of less than 20%.

d. **HAP**

The Wet System Topcoat is subject to 40 CFR Part 63, Subpart III.

x. **Emission Unit U-59 – Purge and Cleaning**

i. **Equipment**

Emission Point	Description	Applicable Regulation	Install Date	Control ID
E-218	Purge and Cleaning	STAR*, 7.25, 40 CFR 63 Subpart III	2015	C-51
* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.				

ID	Description	Performance Indicator	Stack ID
C-51	Booth Exhaust Concentrator	Desorption Gas Inlet Temperature	S-702

ii. **Standards/Operating Limits**

a. **VOC**

For miscellaneous metal coating operations with excess emissions greater than 5 tons per year, regulation 7.25 requires installation and use of Best Available Control Technology. The BACT analysis submitted by the permittee demonstrated that due to the low VOC concentration in the exhaust stream of this process there is no economical and effective method of VOC control.

b. **HAP**

The Wet System Topcoat is subject to 40 CFR Part 63, Subpart III.

III. Other Requirements

- 1. Temporary Sources:** The source did not request to operate any temporary facilities.
- 2. Short Term Activities:** The source did not report any short term activities.

3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request operational flexibility.
5. **Compliance History:**

Incident Date	Regulation Violated	Settlement
8/3/1995	Reg. 1.05	Settled
4/12/1999	Reg. 7.08	Settled
7/21/2004	Reg. 2.16	Board Order
7/21/2004	Reg. 2.16	Board Order

6. **Calculation Methodology or Other Approved Method:**

HAPs and VOC are calculated by a program which tracks all product usage in various emission units and the HAP and VOC content in the materials. It is assumed that the program takes the control devices into account when calculating emissions.

7. **Insignificant Activities**

Description	Quantity	Basis
Internal combustion engines fixed or mobile	115	Regulation 1.02, Appendix A, sec. 2
Storage tanks – Diesel or fuel oil – Not for sale, resale or distribution	3	Regulation 1.02, Appendix A, sec. 3.25
Brazing, soldering or welding equipment	SO: 181/vehicle SUV: 2406/vehicle	Regulation 1.02, Appendix A, sec. 3.4
Woodworking, except for conveying, hogging, or burning wood/sawdust	1	Regulation 1.02, Appendix A, sec. 3.5
Lab venting and exhaust systems (non-radioactive materials)	3	Regulation 1.02, Appendix A, sec. 3.11
Portable diesel or gasoline storage tanks	6	Regulation 1.02, Appendix A, sec. 3.23
Closed pressure storage vessels	100	Regulation 1.02, Appendix A, sec. 3.26
Wastewater Pretreatment system	1	Regulation 1.02, Appendix A, sec. 1.38.1.1
Cooling Towers	8	
Direct heat exchangers < 1 MM Btu/ hr	350	
Portable tote tanks and containers for raw material and/or waste shipment and storage	Various	Regulation 2.16, Section 1.23.1.2
Process Day Tanks	Various	Regulation 2.16, Section 1.23.1.2

Description	Quantity	Basis
Chemical Storage Tanks	30,000 Gal Urea, (2) 550 Gal Diesel for Fire Pumps, 11,000 Gal. Ferric Chloride, 6500 Gal Polymer, (4) 1000 Gal. Booth Chemical/Polymer and Misc. Chemical Storage, and 500 Gal Booth Chemical Tank	Regulation 2.16, Section 1.23.1.2
Fluid Fill (e.g. Hydraulic Fluids, Oils, Antifreeze, Lubricating Fluids, Refrigerant)	Various	Regulation 2.16, Section 1.23.1.2
Stamping Plant Activities (Blank Wash, etc.)	Various	Regulation 2.16, Section 1.23.1.2
Paved and Unpaved Roads and Lots including Temporary Construction Access Roads	Various	Regulation 2.16, Section 1.23.1.2
1000 Gallon Gasoline Storage Tank	1	Regulation 2.16, Section 1.23.1.2
Panel test Spray Booth (R & D)	1	Regulation 1.02, Appendix A, sec. 3.27

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16 section 4.1.9.4.
- 3) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.
- 6) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions or use Potential to Emit (PTE) to be reported on the annual emission inventory.
- 7) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.