



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 072011-009 Project Number: 2010-11-043

Parent Company: Ford Motor Company - Kansas City Assembly Plant

Parent Company Address: The American Road, Dearborn, MI

Installation Name: Ford Motor Company

Installation Number: 047-0019

Installation Address: 8121 U.S. NE Highway 69, Claycomo, MO

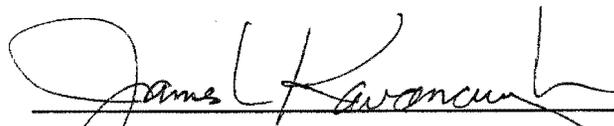
Location Information: Clay County, S27, T51, R32

Application for Authority to Construct was made for:
A Plantwide Applicability Limit (PAL) permit for Particulate Matter less than 10 microns in diameter, Particulate Matter less than 2.5 microns in diameter, Nitrogen Oxides, Sulfur Oxides, and Carbon Monoxide with pre-approved changes. This review was conducted in accordance with Section (8), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUL 20 2011

EFFECTIVE DATE



DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years/18 months from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years/18 months after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Ford Motor Company – Kansas City Assembly Plant
Clay County, S27, T51, R32

1. **Superseding Condition**
The conditions of this permit supersede the following special conditions found in the previously issued construction permit (Permit Number 042008-001) issued by the Air Pollution Control Program.
 - A. Special Condition 23 *Emission Limitation for Non-VOC pollutants*
 - B. Special Condition 24(A) *Nitrogen Oxide Limitation from Permit Number 112000-014(A)*

2. **Annual Emission Limitation – Plantwide Applicability Limitation (PAL)**
 - A. Ford Motor Company Kansas City Assembly Plant shall emit less than the amounts listed in Table 1 from the entire installation in any consecutive 12-month period.

Table 1: PAL levels

Pollutant	PAL (tpy)
Particulate Matter less than 10 microns in diameter (PM ₁₀)	111.7
Particulate Matter less than 2.5 microns in diameter (PM _{2.5})	106.7
Nitrogen Oxides (NO _x)	173.9
Sulfur Oxides (SO _x)	55.5
Carbon Monoxide (CO)	235.8

The consecutive 12-month period shall not include time periods prior to issuance of this construction permit. Emissions during periods of start-up, shutdown, and malfunction of the control device shall be counted towards the limit during the 12-month period.

- B. Ford Motor Company Kansas City Assembly Plant shall track and calculate from the entire installation the monthly and consecutive 12-month emissions of each pollutant listed in Table 1. Attachment A, or equivalent forms approved by the permitting authority shall be used to

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The permittee is authorized to construct and operate subject to the following special conditions:

demonstrate compliance with Special Conditions 2.A.

- C. Ford Motor Company Kansas City Assembly Plant shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B. indicate that the source exceeds the limitation of Special Conditions Number 2.A.
 - D. Ford Motor Company Kansas City Assembly Plant shall keep documentation of any emission factors used to demonstrate compliance with Special Condition 2.A. Emission factors must be obtained from the most recent edition of AP-42, *Compilation of Air Pollutant Emission Factors*, the most recent stack performance test results, a mass balance approach using the Material Safety Data Sheets (MSDS) of all materials, and/or by a method approved by the permitting authority. Documentation sufficient to support the emission factors must accompany Attachment A required by Special Condition 2.B.
 - E. Ford Motor Company Kansas City Assembly Plant shall keep documentation of any overall control efficiencies used to demonstrate compliance with Special Condition 2.A. Overall control efficiency is the product of the capture efficiency and control efficiency of the pollution control device. Documentation sufficient to support the capture and control efficiencies must accompany Attachment A required by Special Condition 2.B.
 - F. Ford Motor Company Kansas City Assembly Plant shall keep documentation of all data relied upon, including but not limited to, any quality assurance/quality control data, in calculating the monthly and annual pollutant emissions.
3. Annual Limitation on Natural Gas Usage
- A. Ford shall not exceed a usage rate of 3,478 million standard cubic feet of natural gas in any 12-month rolling period.
 - B. Ford Motor Company Kansas City Assembly Plant shall track natural gas usage from the entire installation on a monthly and consecutive 12-month basis. Attachment D, or equivalent forms approved by the permitting authority shall be used to demonstrate compliance with Special Conditions 3.A.

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The permittee is authorized to construct and operate subject to the following special conditions:

- C. Ford Motor Company Kansas City Assembly Plant shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 3.B. indicate that the source exceeds the limitation of Special Conditions Number 3.A
4. Pre-Approved Operational and Equipment Modifications
 - A. Ford Motor Company Kansas City Assembly Plant is authorized to perform the physical or operational changes, or changes deemed consistent with those physical or operational changes, listed in Attachment B, *Pre-Approved Changes*, without applying for or obtaining a construction permit or amendment from the permitting authority. Any increase or decrease in emissions of pollutants listed in Table 1 resulting from the construction and operation of any of the above pre-approved changes are subject to the requirements listed in Special Condition 2.
 - B. Ford Motor Company Kansas City Assembly Plant shall maintain a log of equipment installed and/or modified under the Pre-Approved Changes and the date on which construction and/or modification and operation began. In addition, Ford Motor Company Kansas City Assembly Plant shall maintain a log of equipment removed from the installation and the date on which it was removed. The log must account for all equipment present at the installation at any given time. Attachment C, or equivalent forms approved by the permitting authority, may be used for this purpose.
 - C. Ford Motor Company Kansas City Assembly Plant shall notify the permitting authority of all activities associated with any Pre-Approved Change according to Special Condition 5, 6 and 7.
 - D. If Ford Motor Company Kansas City Assembly Plant wishes to make physical or operational changes that are not deemed consistent with the physical or operational changes listed in Attachment B of this construction permit and are not exempt from the construction permit rule, then Ford Motor Company Kansas City Assembly Plant must first apply for and obtain a construction permit or amendment according to 10 CSR 10-6.060, *Construction Permits Required*.
 5. Notification of Actual Construction of Pre-Approved Change

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- A. Ford Motor Company Kansas City Assembly Plant shall submit written notification to the permitting authority (including the regional office) at least ten days prior to the actual construction of any pre-approved change listed in Attachment B. The notification shall contain the following:
 - 1) Detailed description of the physical or operational change including the affect on existing equipment;
 - 2) A plant layout diagram with representation of existing equipment and physical or operational changes;
 - 3) A schedule of construction activities related to the pre-approved change;
 - 4) A statement of applicability for any New Source Performance Standard, National Emissions Standard of Hazardous Air Pollutants and/or state regulations not identified as core requirements in the operating permit;
 - 5) A potential emissions calculation sheet for the pre-approved change including any modeling required by Special Condition 8;
 - 6) A statement of verification that the physical or operational change will not result in installation emissions that exceed the limitations stated in Special Condition 2; and
 - 7) A summary of the impact analysis on the capture efficiency as outlined in Special Condition 10.D.
 - B. This notification shall become an enforceable part of this construction permit upon receipt by the permitting authority and Ford Motor Company Kansas City Assembly Plant shall comply with the terms and conditions of the notification.
 - C. The permitting authority may disapprove any activity that has not been demonstrated to the satisfaction of the Program to be related to the pre-approved changes. At that time, Ford Motor Company Kansas City Assembly Plant shall cease construction of the change until an appropriate authorization of the activities is obtained (such as a construction permit, if necessary).
6. Notification of Actual Start-up of Pre-Approved Change
- A. Ford Motor Company Kansas City Assembly Plant shall submit written notification to the permitting authority (including the regional office) at least ten days prior to the actual start-up or operation of any pre-approved change listed in Attachment B. The notification shall contain the following:
 - 1) Reference to the notification of actual construction including date of notification and brief description of change;

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The permittee is authorized to construct and operate subject to the following special conditions:

- 2) Verification that the physical or operational change was completed as described in the original notification; and
 - 3) Scheduled date operations will be commenced.
- B. It is a violation of this construction permit for Ford Motor Company Kansas City Assembly Plant to construct, modify or operate the installation not in accordance with the notification of 5.A. above.
7. Alternative Notification Requirements
- A. Ford Motor Company Kansas City Assembly Plant may comply with the alternative notification requirements for emission units that are defined as exempt under 10 CSR 10-6.061.
- B. In lieu of the requirements of Special Conditions 5 and 6, Ford Motor Company Kansas City Assembly Plant shall:
- a) Submit a list of the any exempt emission units modified or added to the installation during the previous reporting period in the semi-annual report required in Special Condition 21; and
 - b) Maintain a log of exempt units at the installation as required in Special Condition 4.B.
8. Potential Emission Calculation Requirements for Pre-Approved Changes
- A. Prior to the submission of a notification for the construction of a pre-approved change, Ford Motor Company Kansas City Assembly Plant must evaluate potential emissions for the project for all pollutants including greenhouse gases (GHG).
- B. The project shall be defined for the purposes of this construction permit as the new or modified equipment being installed/modified under Special Condition 4 at the time of notification.
- C. The potential to emit (PTE) of the project shall be determined for the purposes of this construction permit using one of the following methods:
- 1) Actual-to-Potential Test
 - a) For new emission units, the emission rate of the equipment at maximum design capacity assuming continuous year-round operation (8760 hours);
 - b) For a modification to an existing emission unit, the emission rate of the modified emission unit(s) at maximum design capacity assuming continuous year-round operation (8760

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- hours) less the 24-month average baseline actual emissions for the existing emission unit, as defined by 40 CFR 52.21(b)(48)(iii);
 - c) In determining the project PTE, Ford Motor Company Kansas City Assembly Plant may also take into account any equipment being rendered inoperable or permanently removed by subtracting the most recent 24-month average of actual emissions of the removed equipment. Ford must indicate which equipment will be rendered inoperable or removed in the notification for construction required in Special Condition 5. Ford Motor Company Kansas City Assembly Plant must remove or render the equipment inoperable prior to start of operation of the project equipment. Ford Motor Company Kansas City Assembly Plant may not re-install or restart the equipment without prior notification and approval.
- 2) Actual-to-Projected Actual Test
 - a) The maximum annual emission rate at which an emission unit is projected to emit a regulated New Source Review pollutant in any one of the five (5) years following the date that the unit resumes operation less the 24-month average baseline actual emissions for the existing emission unit, as defined by 40 CFR 52.21(b)(48)(iii). Projected actual emissions shall be determined as specified in 40 CFR 52.21(b)(41)(ii);
 - b) In determining the project PTE, Ford Motor Company Kansas City Assembly Plant may also exclude that portion of the unit's emissions following the project that the existing emission unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project, including any increased utilization due to product demand growth;
 - c) In determining the project PTE, Ford Motor Company Kansas City Assembly Plant may also take into account any equipment being rendered inoperable or permanently removed by subtracting the most recent 24-month average of actual emissions of the removed equipment. Ford Motor Company Kansas City Assembly Plant must indicate which equipment will be rendered inoperable removed in the notification for construction required in Special Condition 5.

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The permittee is authorized to construct and operate subject to the following special conditions:

Ford Motor Company Kansas City Assembly Plant must remove or render the equipment inoperable prior to start of operation of the project equipment. Ford Motor Company Kansas City Assembly Plant may not re-install or restart the equipment without prior notification and approval.

- D. Ford Motor Company Kansas City Assembly Plant shall compare the PTE of the project as determined in Special Condition 8.C to the significance level of each PAL pollutant as stated in Table 2. Ford Motor Company Kansas City Assembly Plant must submit refined modeling in accordance with Special Condition 9 for each PAL pollutant whose project PTE as determined in Special Condition 8.C is greater than the significance level in Table 2.

Table 2: PAL pollutant project significance levels

Pollutant	Significance Level (tpy)
PM ₁₀	15
PM _{2.5}	10
SO _x	40
NO _x	40
CO	100

- E. For greenhouse gas (GHG) emissions as defined in CFR 52.21(b)(49)(i), if the PTE of the project as determined in Special Condition 8.C exceeds 75,000 tons per years of CO₂e as defined in CFR 52.21(b)(49)(ii), Ford Motor Company Kansas City Assembly Plant will be required to submit an application for authority to construct prior to construction of the pre-approved change

9. Refined Modeling Requirements

- A. Ford Motor Company Kansas City Assembly Plant must perform modeling for each PAL pollutant whose PTE exceeds the Table 2 significance levels as determined in subsection (C) of Special Condition 8 and compare the impacts to the modeling significant impact levels listed in 40 CFR 51.165(b)(2). The results shall be submitted to the APCP 30 days prior to the initial notification of the project.
- B. If the project impact of a PAL pollutant is greater than the modeling significant impact levels, Ford Motor Company Kansas City Assembly Plant will be required to submit additional modeling, demonstrating compliance with, but not limited to, the National Ambient Air Quality

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The permittee is authorized to construct and operate subject to the following special conditions:

Standard (NAAQS) and increment standards for the pollutant that exceeded the modeling significant impact level. This additional modeling shall be submitted to the APCP within 45 days of the initial notification of the project.

- C. Ford Motor Company Kansas City Assembly Plant assumes all liabilities in constructing prior to approval of a compliant modeling analysis.
- D. If Ford Motor Company Kansas City Assembly Plant cannot demonstrate compliance with the appropriate standard(s) for a particular PAL pollutant, Ford Motor Company Kansas City Assembly Plant will be required to meet one of the following requirements:
 - 1) Install, operate and maintain a system of ambient air monitoring stations for the pollutant with which modeled compliance cannot be demonstrated; or
 - 2) Reduce emission of the pollutant that cannot model compliance such that a refined modeling analysis after the reduction demonstrates compliance with all appropriate standards.
- E. Ford Motor Company Kansas City Assembly Plant will be required to submit a report to the APCP Enforcement Section within 90 days of the initial notification of the project indicating which requirement, stated in subsection (D) of this condition, Ford Motor Company Kansas City Assembly Plant intends to meet.
 - 1) For the monitoring requirement in (D)(i), the report shall include a Quality Assurance Project Plan (QAPP) for each PAL pollutant that could not demonstrate modeled compliance with the appropriate standards based on the following requirements:
 - a) Ford Motor Company Kansas City Assembly Plant shall conduct meteorological monitoring in conjunction with the PAL pollutant monitoring plan. This meteorological monitoring will occur at a minimum of one (1) site as described by an approved QAPP for meteorological data and continue for the duration of the PAL pollutant monitoring
 - b) Ford Motor Company Kansas City Assembly Plant shall locate all PAL pollutant monitors such that the monitors will measure ambient air quality for each pollutant in all areas of maximum impact, as approved by the department.
 - c) Ford Motor Company Kansas City Assembly Plant shall report the data collected in accord with this special condition to the department on a quarterly basis.

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The permittee is authorized to construct and operate subject to the following special conditions:

- d) If concentrations are monitored that exceed a NAAQS, Ford Motor Company Kansas City Assembly Plant shall report the monitored information (the beginning and ending date and time, and the value for the applicable standard time period) within seven (7) days of the event
 - e) Concentrations resulting from this monitoring greater than the NAAQS and attributed to operations permitted herein represent cause for reopening this permit. Ford Motor Company Kansas City Assembly Plant shall:
 - i. conduct a comprehensive review of the results and develop a correction plan;
 - ii. submit the corrective action plan to the permitting authority for approval; and
 - iii. implement the corrective action plan immediately upon department approval.
 - f) The specifications of the monitoring program outlined in the QAPP will contain:
 - i. the conditions under which the monitoring may be discontinued;
 - ii. date sampling will commence. Sampling will begin no later than the commencing of operation; and
 - iii. the nature of the information to be reported (e.g. hourly concentrations).
 - g) In conjunction with the PAL pollutant monitoring program above, Ford Motor Company Kansas City Assembly Plant shall keep records of haul road emissions as outlined in Special Condition 23.A. This includes road activity associated with the plant. Ford Motor Company Kansas City Assembly Plant shall record this information in parallel to the requirements of Special Condition 2 and 23.A. for the duration of the PAL pollutant monitoring program. Ford Motor Company Kansas City Assembly Plant shall submit this information quarterly to the department. Upon demonstration of compliance with the appropriate standard(s), Ford Motor Company Kansas City Assembly Plant may request to end the monitoring program.
- 2) For the modeling requirement in (D)(ii), the report shall include:
- a) A compliance plan for demonstrating compliance with the applicable standards. Ford Motor Company Kansas City Assembly Plant shall implement any such plan immediately upon its approval by the Director; and
 - b) A compliant modeling demonstration supporting the proposed

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The permittee is authorized to construct and operate subject to the following special conditions:

post-reduction emission rates.

10. Capture and Control Equipment

A. The specified control device (e.g. baghouse) must be in use at all times when a control efficiency is claimed for compliance with a PAL pollutant emissions limitation. When a control efficiency is claimed, the control device shall be operated and maintained in accordance with the manufacturer's specifications and within the temperature range determined in Special Condition 11.

B. Control Equipment Requirements

- 1) When a control efficiency is claimed for compliance, the control device shall be operated and maintained in accordance with the manufacturer's specifications. The control device shall be equipped with a gauge or meter, which indicates the pressure drop (or other parameter specified by the manufacturer) across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them.
- 2) When a control efficiency is claimed for compliance, replacement parts (e.g. filters) for the control device shall be kept on hand at all times. The parts shall be made of material appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
- 3) For all controls where compliance is based on a control efficiency, Ford Motor Company Kansas City Assembly Plant shall monitor and record the operating pressure drop (or other parameter specified by the manufacturer) across the control device at least once every 24 hours. The operating pressure drop (or other parameter specified by the manufacturer) shall be maintained within the design conditions specified by the manufacturer's performance warranty.
- 4) For all controls where compliance is based on a control efficiency, Ford Motor Company Kansas City Assembly Plant shall maintain an operating and maintenance log for the control devices which shall include the following:
 - a. Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b. Maintenance activities, with inspection schedule, repair actions,

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

and replacements, etc.

C. Capture Equipment Requirements

- 1) When a control efficiency is claimed for compliance, Ford Motor Company Kansas City Assembly Plant shall evaluate all pre-approved changes that involve PAL pollutant emissions directed to emission control equipment for potential impacts to emission control equipment capture efficiency. This evaluation shall include the following:
 - a) An impact analysis of the pre-approved change on the capture efficiency;
 - b) An determination of the need for a new capture efficiency test based on the impact analysis;
 - c) A summary of the evaluation to be included in the Notification of Actual Construction as stated in Special Condition 5.
- 2) For all controls where compliance is based on a control efficiency, Ford Motor Company Kansas City Assembly Plant shall develop a monitoring plan for each capture system (booth) that:
 - a) Identifies the operating parameter(s) to be monitored to assure capture efficiency,
 - b) Explains why this parameter is appropriate for demonstrating ongoing compliance,
 - c) Identifies the specific monitoring procedures, and
 - d) Specifies the operating parameter value or range of values (or the procedures for establishing the values) that shall be maintained to demonstrate capture efficiency is being maintained.
- 3) For all controls where compliance is based on a control efficiency, Ford Motor Company Kansas City Assembly Plant shall install and maintain, for any intermittently controllable work station, a system to monitor when bypass of the control device system occurs while the work station is in operation.
- 4) For all controls where compliance is based on a control efficiency, Ford Motor Company Kansas City Assembly Plant shall maintain an operating and maintenance log for the capture and control systems (enclosures and thermal oxidizers) for a period of (60) sixty months which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair

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The permittee is authorized to construct and operate subject to the following special conditions:

- actions, and replacements, etc.
 - c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.
11. Performance Testing
- A. Ford Motor Company Kansas City Assembly Plant shall conduct performance tests on any future control devices used for compliance, based on device control efficiencies, with the PAL listed in Table 1. Ford Motor Company Kansas City Assembly Plant shall determine the pollutant destruction and/or removal efficiencies and operating parameters of these control devices when all the processes controlled by these devices are in normal operation. These control efficiencies will be used in Attachment A for compliance.
 - B. For all capture systems where compliance is based on a capture efficiency, Ford Motor Company Kansas City Assembly Plant shall:
 - 1) Confirm that the capture system continues to meet the requirements of EPA Method 204 from an approved performance test with no changes to operating parameters, or
 - 2) Conduct a performance test to determine the capture efficiency and establish the value or range of values for the selected operating parameter(s) when all the processes controlled by these devices are in normal operation. These capture efficiencies shall be used in Attachment A for compliance.
 - C. The testing required in Special Condition 11.B may be limited to conducting tests on a representative stack(s) of each type of equipment, if requested by Ford Motor Company Kansas City Assembly Plant and upon approval by the Director.
 - D. For the testing required in Special Condition 11.B, Section 6 of EPA method 204 of 40 CFR part 51, Appendix M shall be used to confirm that an enclosure meets the requirements for permanent total enclosures. If the enclosure meets the permanent total enclosure criteria and directs all pollutant to a control device, a capture efficiency of 100 percent may be assumed.
 - E. For all controls where compliance is based on a control efficiency and, henceforth, within 5 years of the most recent performance tests, Ford Motor Company Kansas City Assembly Plant shall; by December 31, 2011

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The permittee is authorized to construct and operate subject to the following special conditions:

for the Commercial Paint Shop and the Passenger Paint Shop:

- 1) Conduct performance tests to verify the operating parameters and/or the control efficiencies of the control devices ; and
- 2) Confirm the capture efficiencies of the total or partial enclosures by Special Condition 11.B.1) or 11.B.2).

For any control device installed subsequent to the issuance of this construction permit, performance tests shall be performed within 60 days after installation, but not later than 180 days after initial start-up of the control equipment.

- F. For the testing required in Special Condition 11.B. and 11.E, testing shall be conducted in accordance with the procedures outlined in Special Condition 12. Ford Motor Company Kansas City Assembly Plant shall maintain a record of the results of all performance tests required by Special Conditions 11.A. and 11.B.

12. Proposed Test Plan

- A. For all performance tests required under Special Condition 11, a completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program, Enforcement Section, within thirty days prior to the proposed test date so that the Air Pollution Control Program, Enforcement Section, may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
- B. Two copies of a written report of the performance test results shall be submitted to the Director within thirty days of completion of any required testing, unless an extension is requested and approved by the Director. The extension must be submitted in writing at least ten days prior to the thirty day deadline. The report must include legible copies of the raw data sheets, analytical instrument laboratory data and complete sample calculations from the required U.S. EPA Method for at least one sample run.
- C. The test report is to fully account for all operational and emission parameters addressed both in the construction permit conditions as well as in any other applicable state or federal rules or regulations.

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The permittee is authorized to construct and operate subject to the following special conditions:

13. Startup, Shutdown, and Malfunction Requirement
 - A. Ford Motor Company Kansas City Assembly Plant shall develop and implement an operation and maintenance plan to minimize the instances of excess emissions during start-up, shutdown and malfunction. The operation and maintenance plan shall detail procedures for maintaining, repairing and operating the various sources and their controls (i.e. controls where compliance is based on a control efficiency) during all periods of operation, including start-up, shutdown and malfunction. The operation and maintenance plan shall also comply with the requirements of 10 CSR 10-6.050 *Start-Up, Shutdown and Malfunction Conditions*.

14. Reopening of the Construction Permit
 - A. The permitting authority may reopen this construction permit to accomplish the following actions:
 - 1) Revise Special Condition 2 to reflect an increase in the PAL as outlined in Special Condition 19.
 - 2) Reduce the PAL to reflect newly applicable Federal and/or State requirements with compliance dates after the issuance of this construction permit.
 - 3) Reduce the PAL if the permitting authority determines that a reduction is necessary to avoid causing or contributing to a National Ambient Air Quality Standard or Prevention of Significant Deterioration increment violation, or to an adverse impact on air quality in a Class I area.

 - B. All reopenings that increase the PAL level are required to be placed on public notice for at least a thirty day period for submittal of public comment.

15. PAL Effective Period
 - A. The PAL in Special Condition 2 will be effective for ten years. The PAL term commences on the date of issuance of this construction permit.

16. Permit Application Submission Requirements
 - A. Between six and eighteen months prior to the expiration of the PAL in Special Condition 2, Ford Motor Company Kansas City Assembly Plant shall submit a complete application for the renewal or expiration of the PAL in Special Condition 2. For PAL renewal, Ford Motor Company Kansas City Assembly Plant will be required to comply with Special Condition 17. For PAL expiration, Ford Motor Company Kansas City Assembly Plant will be required to comply with Special Condition 18.

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The permittee is authorized to construct and operate subject to the following special conditions:

- B. Once a complete application according to Special Condition 16.A. is received by the permitting authority, the PAL in Special Condition 2 will remain in effect until a revised PAL or a revised permit incorporating allowable limits is issued by the permitting authority.
 - C. Failure to submit a complete application according to Special Condition 16.A. to the permitting authority at least six months prior to the expiration of the PAL is a violation of this construction permit and will result in the termination of the PAL on the date of expiration. At the time of termination, Ford Motor Company Kansas City Assembly Plant will be required to comply with Special Condition 18.
17. PAL Renewal Requirements
- A. A complete application shall consist of written documentation and/or calculations for the following items:
 - 1) A proposed PAL level;
 - 2) A list of all emissions units with applicable Federal or State requirements;
 - 3) The potential emissions of all current equipment at the installation;
 - 4) Identification of the baseline period;
 - 5) Baseline actual emissions; and
 - 6) A compliance plan for the proposed PAL.
 - B. The permitting authority will have the final authority to set the new plantwide emissions limitation based on the following guidelines:
 - 1) If the baseline actual emissions at the time of renewal are equal to or greater than eighty percent of the PAL, the PAL may be renewed at the same level.
 - 2) The PAL may not be set at a level that is greater than the potential to emit of the entire installation.
 - 3) The PAL shall be adjusted to account for any applicable State or Federal requirement with a compliance date that occurs during the effective period of this PAL.
 - 4) A PAL level higher than the current PAL level cannot be approved unless otherwise approved through Special Condition 19.
 - C. Any request to renew the PAL level is required to be placed on public notice for at least a thirty day period for submittal of public comment.

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

18. Expiration of the PAL
 - A. If Ford Motor Company Kansas City Assembly Plant does not wish to renew the PAL of this construction permit, Ford Motor Company Kansas City Assembly Plant shall apply for and obtain a construction permit for each emissions unit (or each group of emissions units) that existed under the PAL.
 - B. A complete application shall consist of a proposed allowable emission limitation for each emissions unit (or each group of emissions units) by distributing the PAL allowable emissions for the installation among each of the emissions units that existed under the PAL. If the PAL had not yet been adjusted for an applicable requirement that became effective during the PAL effective period, such distribution shall be made as if the PAL had been adjusted.
 - C. The PAL in Special Condition 2 will remain in effect until a revised construction permit is issued by the permitting authority.
 - D. Any physical change or change in the method of operation at the installation that meets the definition of major modification will be subject to major construction permitting requirements.
 - E. Ford Motor Company Kansas City Assembly Plant shall continue to comply with any State or Federal applicable requirements that may have applied either during the PAL effective period or prior to the PAL effective period except for the emissions limitations that are superceded in Special Condition 1.
19. Increase of the PAL during the Effective Period
 - A. If Ford Motor Company Kansas City Assembly Plant wishes to alter Special Condition 2 of this construction permit to allow the installation to emit more than the PAL for any pollutant, Ford Motor Company Kansas City Assembly Plant shall submit a complete application to request an increase in the PAL meeting all the requirements for a major modification.
 - B. A complete application shall consist of written documentation and/or calculations to accomplish the following items:
 - 1) Identify the emissions units contributing to the increase in emissions so as to cause Ford Motor Company Kansas City Assembly Plant's emissions to equal or exceed the PAL in Special Condition 2.
 - 2) Determine the Best Available Control Technology (BACT)

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- 3) equivalent controls for each emission unit using current technology.
3) Demonstrate that the sum of the baseline actual emissions of the small emissions units, plus the sum of the baseline actual emissions of the significant and major emissions units assuming application of BACT equivalent controls, plus the sum of the allowable emissions of the new or modified emissions units exceeds the PAL.
 - 4) Comply with the provisions of a current BACT analysis for all emissions unit(s) identified in Special Condition 19.B(1) in accordance with the requirements of 10 CSR 10-6.060 section (8) regardless of the magnitude of the emissions increase resulting from them.
- C. The revised PAL shall be effective on the day any emissions unit that is part of the PAL major modification becomes operational and begins to emit the pollutant.
- D. The revised PAL level shall be placed on public notice for at least a thirty day period for submittal of public comment.
20. Records Retention Requirement
- A. Ford Motor Company Kansas City Assembly Plant shall maintain all records required by this construction permit for not less than ten years unless otherwise specified in a special condition.
 - B. Ford Motor Company Kansas City Assembly Plant shall make these records available immediately to any Missouri Department of Natural Resources' personnel upon request.
21. Reporting Requirement
- A. Ford Motor Company Kansas City Assembly Plant shall submit a semi-annual emissions report to the permitting authority within 30 days after the end of each reporting period.
 - B. The reporting periods are January 1 - June 30, and July 1 – December 31. The report shall contain the following information:
 - 1) Identification of owner and operator and the permit number;
 - 2) Total annual emissions in tons per year based on a 12-month rolling total for each month in the reporting period;
 - 3) A summary of all data relied upon, including but not limited to, any Quality Assurance or Quality Control data, in calculating the

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- 4) monthly and annual pollutant emissions;
 - 4) A list of any emissions units modified or added to the installation during the preceding six-month period;
 - 5) The number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken;
 - 6) A notification of shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of pollutant;
 - 7) A signed statement by the responsible official certifying the truth, accuracy, and completeness of the information provided in the report.
- C. Ford Motor Company Kansas City Assembly Plant shall submit reports to the permitting authority within ten days of any deviations or exceedance of permitting requirements. The report shall contain the following information:
- 1) The identification of owner and operator and the permit number:
 - 2) The permit requirement that experienced the deviation or that was exceeded:
 - 3) Emissions resulting from the deviation or the exceedance: and
 - 4) A signed statement by the responsible official certifying the truth, accuracy, and completeness of the information provided in the report.
22. Quality Assurance/Quality Control Plan
- A. Where compliance is based on a control and/or capture efficiency, Ford Motor Company Kansas City Assembly Plant shall maintain an operation and maintenance plan on site at all times. A table of contents of the plan shall be submitted to the permitting authority within sixty days of the issuance of this construction permit and updated within 60 days of receipt of the performance test reports required of Special Condition 12. The plan shall be a detailed, specific to the Kansas City Assembly Plant and include the following information:
 - B. A preventative maintenance program for avoidance of excess emissions which shall include all maintenance activities, with inspection schedule, repair actions, and replacements inventory.

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

- C. A range of operating conditions and outlet variables for normal operation.
 - D. A summary of operating conditions and outlet variables for all control equipment that will be monitored for malfunction or breakdown and a description of the method of detecting and informing responsible personnel of any malfunction or breakdowns, including alarm systems, lights and other indicators.
 - E. A description of the generic corrective procedures that will be taken in the event of a malfunction or breakdown in order to restore compliance with the applicable emission limitations and permit conditions (e.g. reducing of production rate).
23. Haul Road Requirements
- A. Ford Motor Company Kansas City Assembly Plant shall include haul road emissions in the compliance demonstration for the limits in Special Condition 2 by maintaining the following information:
 - i) daily recordkeeping of the weight (tons) of materials received and shipped by truck per day, and number of trucks. In determining actual emissions, an average truck weight may be used in determining compliance. Daily calculations may be performed on a monthly basis as necessary to determine compliance with Special Condition 2.
 - ii) silt loading of the haul road
 - iii) the emissions equation from AP-42 used in calculating actual emissions
 - iv) length of the haul road
 - v) a Fugitive Dust Control Plan (FDCP) to control emissions from haul roads. Ford Motor Company Kansas City Assembly Plant must also provide details on how the plan will be maintained and implemented.
 - B. Ford Motor Company Kansas City Assembly Plant shall conduct a series of silt loading performance tests conducted at least once per quarter of the first year, beginning in the first complete quarter, after issuance of this construction permit and once every 6 months thereafter. The silt loading tests shall be conducted in accordance with ASTM-C-136 method. A summary of this method is found in Appendix C of AP-42. The results

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SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

shall be used in the compliance demonstration plan required by Special Condition 23.A.

- C. For each day of operation, Ford Motor Company Kansas City Assembly Plant shall conduct a survey of the plant property and haul roads to determine if visible fugitive emissions are being generated and leaving plant property. If after 12 months of daily surveys, no visible fugitive emissions are observed being generated and leaving plant property, weekly surveys may replace daily surveys. Daily surveys may be re-instated if Department of Natural Resources' personnel have reasonable cause, such as observation of visible fugitive emissions.
 - D. Documentation of all corrective actions and daily surveys shall be maintained in a log. Ford Motor Company Kansas City Assembly Plant shall water haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.
24. Operational Requirements from Previous Construction Permit Number: 1089-001A
- A. Ford Motor Company Kansas City Assembly Plant shall supply the Air Pollution Control Program blueprints showing rooftop locations of all exhaust stacks for both existing and new stacks for all processes that would have required a permit prior to the issuance of the PAL permit
 - B. Each stack must be identified by the associated source operation name and a short code that Ford chooses.
 - C. There must be a unique code for all stacks associated with each new process that would have required a permit without the PAL permit in place. Ford must permanently mark these codes onto the corresponding exhaust stacks on the roof.
 - D. The code system Ford uses can be symbols (alpha/numeric), color bars, or another system approved by the personnel.
 - E. This action will allow department personnel to identify which source is not meeting regulatory requirements, if the situation occurs.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2010-11-043
Installation ID Number: 047-0019
Permit Number:

Ford Motor Company – Kansas City Assembly Plant Complete: November 12, 2010
8121 U.S. NE Highway 69
Claycomo, MO 64119

Parent Company:
Ford Motor Company
The American Road
Dearborn, MI 48126

Clay County, S27, T51, R32

REVIEW SUMMARY

- Ford Motor Company Kansas City Assembly Plant has applied for a Plantwide Applicability Limitation (PAL) permit for pre-approved changes at the existing automobile assembly plant in Kansas City, Missouri.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. However, HAP emissions may not exceed acceptable ambient air quality concentrations as required by special conditions of this construction permit.
- Subpart MM of the New Source Performance Standards (NSPS), for *Automobile and Light Duty Truck Surface Coating Operations*, applies to the installation. Subpart Dc, for *Small Industrial-Commercial-Institutional Steam Generating Units*, applies to the four phosphate boilers.
- The Maximum Achievable Control Technology (MACT) standards, 40 CFR Part 63, Subpart IIII, and National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks, and Subpart EEEE, Organic Liquids Distribution (Non-Gasoline) applies to the installation.
- No new control device is being proposed at the time of issuance of this permit.
- At the time of permit issuance, there are no processes or associated control equipment where emissions are calculated or compliance is demonstrated through the use of a control efficiency.
- This review was conducted in accordance with Section (8) of Missouri State Rule 10 CSR 10-6.060, Construction Permits Required. Emissions of PM₁₀, PM_{2.5}, NO_x, SO_x, and CO for the entire installation are each conditioned with a separate PAL.
- This installation is located in Clay County, an attainment area for all criteria air

pollutants.

- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not required prior to issuance of this construction permit. However, refined modeling for PAL pollutants is required as specified in the special conditions of this construction permit.
- Emissions testing are required for sources utilizing a control efficiency and emission control equipment as a part of the PAL requirements.
- Revision to the installation's Part 70 Operating Permit is required for this installation within 1 year from permit issuance.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Ford Motor Company Kansas City Assembly Plant (Ford) owns and operates an existing automobile assembly plant in Claycomo, Missouri. This installation is a major source of SO_x, NO_x, HAPs and VOC emissions. A PAL permit (Permit Number 042008-001) for VOCs was issued in March 2008. A Part 70 Operating permit (OP2008-044) was issued in November 2008. A list of existing equipment and a summary of the existing emission points can be found in Table B.

To simplify Ford's permit history, the VOC PAL permit included a condition that superseded the conditions of all previously issued construction permits. However, some of the conditions in those previously issued construction permits were not affected by the VOC PAL requirements and were carried over into the VOC PAL permit as Special Conditions 23, 24 and 25. Specifically, the special conditions of Permit Numbers 112000-014(A) and 042006-012 addressed non-VOC (i.e. NO_x and HAP) issues that would still have been effective after the issuance of the VOC PAL permit. In addition, Permit Numbers: 1089-001(A), 0690-016, and 0594-034 contained special conditions that set emission rates and/or requirements that were established by consent decree, BACT or compliance reasons.

With the issuance of the PM₁₀, PM_{2.5}, NO_x, SO_x, and CO PAL in this construction permit, a few of these carried-over conditions will no longer be necessary, such as Special Condition 23 which requires Ford to track the potential emissions of non-VOC pollutants. Therefore, a condition has been added that will supersede Special Conditions 23 and 24(A) in the VOC PAL permit.

PROJECT DESCRIPTION

Ford has applied for a Plantwide Applicability Limitation (PAL) permit from the Air Pollution Control Program which will limit emissions on PM₁₀, PM_{2.5}, NO_x, SO_x, and CO from the entire installation. Under the PAL permit, Ford Motor Company will be allowed to construct pre-approved changes at the installation with little advance notice. The PAL permit is expected to lower overall plant emissions and increase manufacturing flexibility.

The pre-approval of certain types of physical and operational changes in the permit is designed, in part, to facilitate the facility's implementation of pollution prevention projects, including potential installation of control devices on previously uncontrolled equipment. This permit is explicitly designed to enable the Kansas City Assembly Plant to accomplish this in a streamlined manner.

The PAL permit limits plantwide PM₁₀, PM_{2.5}, NO_x, SO_x, and CO emissions based on historical actual emissions and a reasonable operational margin. With the issuance of this construction permit, the company would be allowed to make modifications to operations without triggering major or minor construction permitting as long as emissions from the installation remained below the PAL "emissions cap". A PAL is established for existing emissions units with an emissions history greater than 24-months, using the average rate of emissions during any one consecutive 24-month period. This 24-month period must be contained within the 10-year period immediately preceding the application for a PAL. New equipment that is constructed after the baseline period are added into the baseline emissions using the potential emissions of the equipment.

Once the average is determined, a reasonable operating margin can be added to the average and must be set such that major construction is not triggered. This assures that the environment sees no significant increase in emissions compared to the baseline actual emissions existing before the PAL is established.

In order to give the company flexibility in making changes quickly to their facility that will meet market demands, the permitting authority is granting Ford Motor Company a PAL permit. Based on existing potential emissions, Ford Motor Company is currently considered major for VOC, HAPs, SO_x, and NO_x, and minor for all other criteria air pollutants. Under this application, Ford Motor Company has requested a PAL for PM₁₀, PM_{2.5}, NO_x, SO_x, and CO. To determine the PAL, emissions reported in the Emissions Inventory Questionnaires (EIQs) were examined. It should be noted that the actual emissions of the proposed PAL pollutants in the EIQs were not based on the use of a control efficiency. In addition, errors, such as the use of wrong natural gas combustion emission factors, were found in the EIQ submissions but were corrected to accurately reflect actual emissions at the facility. Table 3 summarizes these values.

Table 3: Actual emissions over the last 10 years

Emission Year	Emission of CO (tons)	Emission of NO _x (tons)	Emission of PM ₁₀ (tons)	Emission of PM _{2.5} (tons)	Emission of SO ₂ (tons)
2009	56.8	67.6	64.7	64.7	0.4
2008	57.1	68.0	62.5	62.5	0.4
2007	60.8	73.6	59.2	59.2	10.8
2006	63.7	76.2	69.2	69.2	3.7
2005	69.3	82.8	76.6	76.6	3.3
2004	71.2	88.4	79.7	79.7	26.1
2003	79.1	94.8	113.2	113.2	4.7
2002	80.2	96.2	79.4	79.4	5.7
2001	74.0	88.8	61.8	61.8	5.6
2000	89.0	106.5	54.6	54.6	5.1

Adjustments to the PAL can be made if during the baseline period emission units have been permanently shut down or started up. During Ford's 10-year look back period, several combustion sources have been installed since the selected baseline period. These sources include seven 20 million BTU/hr natural gas space heaters which began operation in 2002, one 4 MMBTU/hr natural gas fired regenerative thermal oxidizer (RTO), and one 7 MMBTU/hr natural gas fired RTO which were installed in 2008. Potential emissions of these sources were added to the baseline period emissions as an adjustment of the PAL as shown in Table 5.

Table 4: Potential Emissions of Equipment Installed During Baseline Years

Pollutant	Potential Emissions in tons per year	
	Equipment Installed in 2002	Equipment Installed in 2008
CO	50.5	3.97
NO _x	31.6	4.72
PM ₁₀	4.57	0.36
PM _{2.5}	4.57	0.36
SO _x	0.36	0.03

In addition to any newly installed equipment, the PAL should be reduced such that any federal or state regulatory requirements that have become effective must be taken into account. During the baseline period chosen, no such regulatory requirements have been promulgated.

Table 5: Adjusted baseline emissions over the last 10 years

Emission Year	Emission of CO (tons)	Emission of NO _x (tons)	Emission of PM ₁₀ (tons)	Emission of PM _{2.5} (tons)	Emission of SO ₂ (tons)
2009	56.8	67.6	65.1	65.1	0.4
2008	57.1	68.0	62.5	62.5	0.4
2007	64.7	78.3	59.5	59.5	10.9
2006	67.7	81.0	69.6	69.6	3.8
2005	73.3	87.5	77.0	77.0	3.3
2004	75.2	93.2	80.1	80.1	26.5
2003	83.1	99.5	113.6	113.6	4.8
2002	84.2	101.0	79.8	79.8	5.8
2001	128.5	125.1	66.7	66.7	6.1
2000	143.4	142.9	59.5	59.5	5.5

The two years that produced the highest two-year average emissions are highlighted in Table 5. To set the emissions cap, a reasonable operating margin for each pollutant was set just below the significance levels for major source reviews. Table 6 outlines how the PAL was set for each pollutant

Table 6: Setting the PAL level

	Pollutant				
	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂
Baseline Years	2000-1	2000-1	2002-3	2002-3	2002-3
2-year average of adjusted baseline emissions (tpy)	136.0	134.0	96.8	96.8	15.6
Significance Level (tpy)	100	40	15	10	40
PAL (tpy)	235.8	173.9	111.7	106.7	55.5

Attachment A, or any form approved by the permitting authority, will be used to demonstrate compliance with the emissions limitation. Attachment A is intended to account for emissions from the entire installation including any equipment added or removed under authority of this construction permit. Minor emission sources, such as space heaters, must also be included in the compliance demonstration even though the equipment may be “exempt” from construction permits. Fugitive emissions, such as haul roads, must also be included in the compliance demonstration.

The method of compliance (e.g. mass balance) must also be indicated on the Attachment. Although Attachment A implies that emissions must be reconciled monthly, Ford Motor Company will be required to account for daily emissions that occur as a result of start-up, shut-down, and/or malfunction of the control device. Accordingly, Ford Motor Company may use monthly inventory data to backcast daily emissions prorated on each day’s production rates during such times.

For equipment that is added or removed under authority of this construction permit, Ford Motor Company must keep a record of these additions/removals per Special Condition 4.B. Furthermore, Ford Motor Company must verify any emission factors and control efficiencies applied to emissions from the installation through documentation accompanying the Attachment.

Documentation may include Material Safety Data Sheets specific to the material being used and/or recent stack performance test results. In particular, the documentation should include explicit details on how the emission factor and/or control efficiency was determined. At the time of permit issuance, the emission factors used to determine compliance with the PAL for each existing emission unit has been approved and are listed in Table B. The approval of these emission factors was necessary to ensure that an underestimation/overestimation of the emissions from the installation will not occur. Construction permit staff believes that since the emission factors approved for compliance with the PAL (i.e. Table B) are the same emission factors used to determine the baseline actual emissions when setting the PAL levels, Ford will not be subjected to any unfair advantage/disadvantage that would occur if an under-estimating emission factor was used to demonstrate compliance with a PAL level that was established using an overly conservative emission factor or vice versa.

Attachment A outlines the compliance methods Ford may use to demonstrate compliance with the PAL. If Ford wishes to utilize a different emission factor than what is listed in Table B or an emission factor that has not been pre-approved, Ford must seek approval from the permitting authority prior to use in any compliance demonstration. For new equipment, approval can be requested through the notification process.

Under the emissions limitation, Ford Motor Company is authorized to perform physical and operational changes stated in the list of pre-approved changes found in Attachment B, *Pre-Approved Changes*. Prior to construction of a pre-approved change, Ford Motor Company is required to send notification of construction to the Air Pollution Control Program. Special Condition 5 outlines the elements required in the notification, including an emissions summary and an impact analysis of the change on other operational factors such as capture efficiency.

The pre-approved changes are reviewed at the time of the change using, where applicable, the Protocol for Determining the Daily Volatile Organic Compound emission Rate of Automobile and Light-Truck Topcoat Operations (EPA-450/3-88-018). This construction permit may be amended to include activities that are not identified in the original list of pre-approved modifications if those activities will not increase emissions over the PAL.

Once this construction permit is issued, Ford Motor Company is authorized to construct and operate any pre-approved modification in accordance with the notification system (Special Conditions 5, 6 and 7). Prior to commencement of construction and operation, Ford Motor Company must submit notification to the permitting authority describing all required details of the operational and/or physical changes being performed.

As a part of the initial notification, or notification of construction, Ford Motor Company is required to submit a statement verifying that the physical or operational change will not result in installation emissions that exceed the plantwide limitations of each PAL pollutant. Construction permits staff believes that the notifications are similar to pre-construction waivers, where the applicant is requesting authority to start construction before issuance of the permit. In this case, if a change is determined to be inconsistent with the pre-approved changes, and the change requires an amendment to the permit, the statement of verification serves as assurance that the change will not affect the limit.

Additionally, Ford will be required to confirm that the physical or operational change will not cause or contribute to a violation of any applicable air standards by determining the impact of the change on the ambient air. The mechanism for this kind of determination is specified in the conditions of this construction permit and based on Missouri's minor New Source Review (NSR) modeling requirements. Ford will be required to evaluate the potential emissions of the changes, defined overall as the project, prior to the initial notification. Ford will be allowed to reduce the potential emissions of the project if emission units are being "permanently" removed. That is, Ford will not be able to operate the removed equipment without prior approval. The sole purpose of this allowance is to determine if the project meets the criteria for modeling under the minor NSR modeling requirements. If the resulting potential emissions of the project are above the de minimis levels for any of the PAL pollutants, Ford will be required to model the emission of the PAL pollutant that exceeds the de minimis level and compare the impacts with the modeling significance levels.

The results of significant impact modeling must be reported to the Air Program at least 30 days prior to the submission of the initial notification. No further modeling is required if the impact of the proposed changes are below the modeling significance levels. For those pollutants that exceed the modeling significance levels, Ford will be required to submit compliant modeling for the entire installation within 45 days after the initial notification is submitted. Ford is given an additional 45 days after a non-compliant modeling report has been submitted to decide whether to either conduct ambient air monitoring or reduce emissions at the installation.

Although the federal rules do not specify modeling as a part of the PAL regulations, the Environmental Protection Agency (EPA) states in the Federal Register notice for the PAL (Vol. 67, No. 251, p. 80222) that any air quality issues should be managed by the reviewing authority's existing programs such as the minor NSR construction permit program. Moreover, the permitting authority may request air quality modeling for any changes if it believes that the changes under the PAL may affect the NAAQS and PSD increments. The conditions of this construction permit have set forth general criteria to ascertain which changes may have a possible effect on air standards.

Once received, these notifications will become incorporated into the construction permit, and compliance with the notifications will be enforceable. The plant wide limitation set forth in this construction permit is effective for a period of 10 years from the date of issuance. At least six months prior to, but not earlier than 18 months from, the

expiration date of this plantwide limitation, Ford Motor Company must submit a request for either the renewal of or the termination of the PAL per Special Conditions 17 through 19.

Once a request for renewal is received by the permitting authority, the PAL will continue as an enforceable requirement. At that time, the PAL will be re-evaluated to account for newly applicable requirements and/or declining potential emissions. For example, if Ford Motor Company removes equipment from the installation that results in a total decrease in potential emissions below the current PAL, the renewed PAL must be adjusted downward accordingly. On the other hand, if applicable requirements and potential emissions remain the same, or if the Director deems it appropriate, the PAL may remain at the same level.

However, if Ford Motor Company wishes to allow the PAL to terminate, Ford Motor Company must submit a proposed approach for allocating the plantwide limitation among existing emissions units for review and approval. The allowable emission limitations for each emissions units will be based on a 12-month rolling basis. In addition, once the original PAL expires, Ford Motor Company may not perform activities previously approved under this construction permit and must comply with the permitting requirements found in Sections (5), (6), (7), (8), and (9), as appropriate.

Once Ford Motor Company requests termination of, expiration of, or an increase in the PAL, Ford Motor Company must submit appropriate applications for revised or replacement permits. During any review by the permitting authority and until a valid construction permit is issued, Ford Motor Company must continue to comply with the plantwide limitation in Special Condition 2 of this construction permit.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies obtained from the most recent edition of the EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, shall be used to determine compliance with the PAL as specified in Appendix A and Table A, unless performance testing data is available and approved by the Air Pollution Control Program. For materials that contain PM and for which there is a Material Safety Data Sheet (MSDS), a mass balance approach should be used to determine emissions from the process. The upper limit of any content range stated in the MSDS must be used in the calculations unless approved tests indicate a more appropriate value.

Due to the nature of the flexible permit, potential emissions of the application and existing potential emissions were not determined. Existing actual emissions were taken from the 2009 EIQ. The following table provides an emissions summary for this project.

Table 7: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2009 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	N/D	65.1	N/D	112.1
SO _x	40.0	N/D	0.4	N/D	55.6
NO _x	40.0	N/D	67.6	N/D	173.9
VOC	40.0	2363	1347.5	N/A	2,363*
CO	100.0	N/D	56.8	N/D	235.9
HAPs	10.0/25.0	N/D	0.02	N/A	N/A

N/A = Not Applicable; N/D = Not Determined
 *VOC PAL established in Permit #042008-001

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (8) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Emissions of PM₁₀, PM_{2.5}, NO_x, SO_x, and CO for the entire installation are each conditioned with a separate PAL.

APPLICABLE REQUIREMENTS

Ford Motor Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400
- *New Source Performance Regulations, 10 CSR 10-6.070 – New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations*, 40 CFR Part 60, Subpart MM
- *New Source Performance Regulations, 10 CSR 10-6.070 – New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units*, 40 CFR Part 60, Subpart Dc
- *Control of Emissions From Industrial Surface Coating Operations*, 10 CSR 10-2.230
- *Maximum Achievable Control Technology Regulations, 10 CSR 10-6.075 – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light duty Trucks*, 40 CFR Part 63, Subpart IIII
- *Maximum Achievable Control Technology Regulations, 10 CSR 10-6.075 – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)*, 40 CFR Part 63, Subpart EEEE
- *Restriction of Emission of Sulfur Compounds*, 10 CSR 10-6.260
- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-3.060

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling is required to determine the ambient impact of PAL pollutants whose emissions from any physical or operational change performed under the pre-approved changes of this construction permit exceed de minimis levels.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (8), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Emily Wilbur
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated October 28, 2010, received November 12, 2010, designating Ford Motor Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey.

Table B: Emission Point Summary

Ford Motor Company – Kansas City Assembly Plant

Clay County, S27, T51, R32

Project Number: 2010-11-043

Installation ID Number: 047-0019

Permit Number:

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
EU0010	Passenger Body Shop	Passenger Body Shop Welding and Grinding	EP-49	PM	AP-42 Sect. 12.19	10.1 lb/1,000 lb electrode consumed	N/A		
		Passenger Body Shop Sealer	EP-49	VOC, HAP	N/A	N/A			
EU0020	Passenger Electrocoat (E-Coat)	Passenger E-Coat Tank	EP-02	VOC, HAP	N/A	N/A			
		Passenger E-Coat Oven	EP-03	Combustion Products	SCC 40201001	3	0.6	100	84
		Passenger E-Coat Oven RTO	EP-03	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
EU0030	Passenger Sealer	Passenger Sealer Deck	EP-04	VOC, HAP	N/A	N/A			
		Passenger Sealer Oven	EP-04	Combustion Products	SCC 40201001	3	0.6	100	84
EU0040	Passenger PVC Enclosure	Passenger PVC Booth	EP-05	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Passenger PVC Oven	EP-06	Combustion Products	SCC 40201001	3	0.6	100	84
EU0050	Passenger	Passenger Guidecoat	EP-07	VOC, HAP,	SCC	7.6	0.6	100	84

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
	Guidecoat	Booth		Combustion Products	10200602/3				
		Passenger Guidecoat Oven	EP-08	Combustion Products	SCC 40201001	3	0.6	100	84
		Passenger Painting Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
		Passenger Guidecoat Purge and Clean	EP-54	VOC, HAP	N/A	N/A			
EU0060	Passenger Topcoat	Passenger Topcoat Booth 1	EP-09	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Passenger Topcoat Booth 2	EP-10	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Passenger Topcoat Oven 1	EP-11	Combustion Products	SCC 40201001	3	0.6	100	84
		Passenger Topcoat Oven 2	EP-12	Combustion Products	SCC 40201001	3	0.6	100	84
		Passenger Topcoat Oven RTO	EP-11,12	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Passenger Topcoat Painting Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
		Passenger Topcoat Purge and Clean	EP-54	VOC, HAP	N/A	N/A			
		Passenger Spot Repair	EP-24	VOC, HAP	N/A	N/A			
EU0070	Passenger Wax	Passenger Wax	EP-13	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
		Passenger Wax Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
EU0080	Passenger Blackout	Passenger Blackout Booth	EP-31	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Passenger Blackout Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
EU0090	Passenger Final Repair	Passenger Final Repair Booth	EP-26	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Passenger Final Repair Oven	EP-27	Combustion Products	SCC 40201001	3	0.6	100	84
		Passenger Final Repair Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
EU0100	Passenger Glass Install	Passenger Windshield Glass Install	EP-55	VOC, HAP	N/A	N/A			
		Passenger Quarterglass Install	EP-48	VOC, HAP	N/A	N/A			
EU0105	Passenger Ditch Molding	Passenger Ditch Molding	EP-47	VOC, HAP	N/A	N/A			
EU0120	Commercial Body Shop	Commercial Body Shop Welding and Grinding	EP-56	PM	AP-42 Sect. 12.19	10.1 lb/1,000 lb electrode consumed	N/A		
		Commercial Body Shop Sealer	EP-56	VOC, HAP	N/A	N/A			
EU0130	Commercial	Commercial E-Coat	EP-15	VOC, HAP	N/A	N/A			

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)				
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO	
	Electrocoat (E-Coat)	Tank								
		Commercial E-Coat Oven	EP-16	Combustion Products	SCC 40201001	3	0.6	100	84	
EU0140	Commercial Sealer	Commercial Sealer Deck	EP-17	VOC, HAP	N/A	N/A				
		Commercial Sealer Oven	EP-17	Combustion Products	SCC 40201001	3	0.6	100	84	
EU0150	Commercial Guidecoat	Commercial Guidecoat Booth	EP-18	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84	
		Commercial Guidecoat Booth RTO	EP-18	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84	
		Commercial Guidecoat Oven	EP-19	Combustion Products	SCC 40201001	3	0.6	100	84	
		Commercial Guidecoat Operations		PM	Test Data	3 grains per 1,000 scf	N/A			
		Commercial Guidecoat Oven RTO	EP-19	Combustion Products	SCC 10200602/3	7.6	0.6	100	84	
		Commercial Guidecoat Purge and Clean	EP-57	VOC, HAP	N/A	N/A				
EU0160	Commercial Topcoat	Commercial Topcoat Booth	EP-20	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84	
		Commercial Topcoat Booth RTO	EP-20	VOC, HAP, Combustion Products	SCC 10200602/3	7.6	0.6	100	84	
					SCC 10200602/3					
		Commercial Tutone Booth	EP-21	VOC, HAP, Combustion		7.6	0.6	100	84	

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
				Products					
		Commercial Topcoat Oven	EP-22	Combustion Products	SCC 40201001	3	0.6	100	84
		Commercial Topcoat Oven RTO	EP-22	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Commercial Tutone Oven	EP-23	Combustion Products	SCC 40201001	3	0.6	100	84
		Commercial Tutone Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
		Commercial Spot Repair	EP-24	VOC, HAP	N/A	N/A			
		Commercial Topcoat Purge and Clean	EP-57	VOC, HAP	N/A	N/A			
EU0170	Commercial Blackout	Commercial Blackout Booth	EP-25	VOC, HAP	N/A	N/A			
		Commercial Blackout Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
EU0180	Commercial Final Repair	Commercial Final Repair Operations		PM	Test Data	3 grains per 1,000 scf	N/A		
		Commercial Final Repair Booth	EP-26	VOC, HAP Combustion Products	SCC 10200602/3	7.6	0.6	100	84
		Commercial Final Repair Oven	EP-27	Combustion Products	SCC 40201001	3	0.6	100	84
EU0190	Commercial Glass Install	Commercial Windshield Glass Install	EP-58	VOC, HAP	N/A	N/A			
EU0200	Powerhouse	Powerhouse Boiler #1	EP-36	Combustion	Testing	N/D			

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
	Boiler #1			Products	Required				
EU0210	Powerhouse Boiler #2	Powerhouse Boiler #2	EP-33	Combustion Products	Testing Required	N/D			
EU0220	Powerhouse Boiler #3	Powerhouse Boiler #3	EP-33	Combustion Products	Testing Required	N/D			
EU0230	E-Lab Boiler	E-Lab Boiler	EP-34	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
EU0240	Fitness Room Boiler	Fitness Room Boiler	EP-34	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
EU0250	Solvent Degreasers	Solvent Degreasers	EP-35	VOC, HAP	N/A	N/A			
EU0260	Gasoline UST (3)	Gasoline UST (3)	EP-37	VOC, HAP	N/A	N/A			
EU0270	Scuff Booths (5)	Scuff Booths (5)	EP-40	PM, and Combustion Products	Approved Test Data and SCC 10200602/3	0.0012 lb/vehicle and 7.6	0.6	100	84
EU0280	Seven 20 MMBTU/Hr Space Heaters	Seven 20 MMBTU/Hr Space Heaters	EP-34	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
EU0290	20,000 Gallon Windshield Washer Fluid UST	20,000 Gallon Windshield Washer Fluid UST	EP-44	VOC, HAP	N/A	N/A			
	Miscellaneous Solvent Use	Miscellaneous Solvent Use	EP-42	VOC, HAP	N/A	N/A			
EU0310	Fluidized Bed Skid Cleaner	Fluidized Bed Skid Cleaner	EP-53	PM, Combustion Products	SCC 10200602/3	7.6	0.6	100	84

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
	N/A	Passenger Scrap Paint Tank	EP-38	VOC, HAP	N/A	N/A			
	N/A	Passenger Spent Solvent Tank	EP-38	VOC, HAP	N/A	N/A			
	N/A	Passenger Phosphate System	EP-01	VOC, HAP	N/A	N/A			
	N/A	Passenger Phosphate Boilers	EP-34	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
	N/A	Passenger Fluid Fill	EP-50	VOC, HAP	N/A	N/A			
	N/A	Passenger Paint Mix Room	EP-46	VOC, HAP	N/A	N/A			
	N/A	Commercial Scrap Paint Tank	EP-38	VOC, HAP	N/A	N/A			
	N/A	Commercial Spent Solvent Tank	EP-38	VOC, HAP	N/A	N/A			
	N/A	Commercial Phosphate System	EP-14	VOC, HAP	N/A	N/A			
	N/A	Commercial Phosphate Boilers	EP-34	Combustion Products	SCC 10200602/3	7.6	0.6	100	84
	N/A	Commercial Fluid Fill	EP-50	VOC, HAP	N/A	N/A			
	N/A	Commercial Paint Mix Room	EP-46	VOC, HAP	N/A	N/A			
	N/A	Petroleum Tanks (3)	EP-43	VOC, HAP	N/A	N/A			
	N/A	Waste Oil AST	EP-45	VOC, HAP	N/A	N/A			
	N/A	Paint Stripper	EP-29	VOC, HAP	N/A	N/A			
	N/A	Wastewater Treatment Plant	EP-51	N/A	N/A	N/A			
	N/A	Product Storage Tanks	EP-52	VOC, HAP	N/A	N/A			
	N/A	Space Heaters	EP-34	Combustion	SCC	7.6	0.6	100	84

Emission Unit Number	Emission Unit Description	Emission Point Description	EIQ Emission Point Number	Regulated Pollutants	Emission Factor Source	Pre-Approved AP-42 or Manufacturer's Emission Factors (lb pollutant/10 ⁶ scf, unless otherwise specified)			
						PM ₁₀ /PM _{2.5}	SO ₂	NO _x	CO
				Products	10200602/3				
	NA	Haul Roads		PM	AP-42 Sect. 13.2.1	Sect. 13.2.1	N/A	N/A	N/A
	N/A	Hot Water Heaters	EP-34	Combustion Products	SCC 10200602/3	7.6	0.6	100	84

N/A: Not Applicable
N/D: Not Determined

Attachment A: Compliance Calculations and Worksheet

Ford Motor Company Kansas City Assembly Plant
Clay County, S27, T51, R32
Project Number: 2010-11-043
Installation ID Number: 047-0019
Permit Number:

The calculation methods for demonstrating compliance with Special Condition 2 (A) are described below. Table A provides an example worksheet that will be used to identify the sources of pollutant emissions, the emissions calculations method used, and the monthly emissions (tons). In the event of a discrepancy between any emission calculation methodology listed in Table A and those in the Auto Protocol or Auto MACT requirements, the Auto Protocol and/or Auto MACT methodology, combined with any EPA or Air Pollution Control Program policies implementing the Auto Protocol and/or Auto MACT mandated requirements, shall take precedence.

Recordkeeping – Material Balance for Non-Combustion PM Emissions

On each day of operation, the Permittee shall record and maintain records of the total quantity of all materials used at the emission units identifying “material balance” or “mass balance” as the emissions calculation method in Table A. PM emissions include PM₁₀ and PM_{2.5} emissions. The Permittee may request an extension of the record completion date by submitting the request in writing to the Staff Director. The request must be received at least ten days prior to the 20th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 20th of the month, the Permittee shall calculate and record the following:

1. The total usage of PM containing materials for the previous calendar month using the daily PM emission records. The record shall also include the solids (PM) content of each material as determined by (1) Material Safety Data Sheet, (2) laboratory test data or (3) product specification information, which ever is most representative for each material used; the record shall indicate the source of solids (PM) content for each material used. Other alternative methods approved by the Director may be used. The Director reserves the right to require the Permittee to determine the solids (PM) contents of any material according to EPA reference methods. The amount of PM emissions for each month shall be determined by multiplying the amount of PM containing materials used by the solids (PM) content of each material.
2. The PM emissions for each emissions unit and the total facility for the previous month. PM emissions shall be determined from the total PM containing materials used for each emissions unit multiplied by one minus the capture efficiency for each emissions unit multiplied by the control efficiency of the control device used, as represented in the following equation:

$$PM \text{ emissions} = PM \text{ used} (1 - \text{capture efficiency} \times \text{control efficiency})$$

Where:

- PM emissions* are expressed as pounds (or tons)
- PM used* is expressed as pounds (or tons)
- Capture efficiency is expressed as a fraction (i.e., percent capture divided by 100)
- Control efficiency is expressed as a fraction (i.e., percent capture divided by 100)

Total facility PM emissions shall be calculated by summing the PM emissions from each emissions unit.

3. The twelve month rolling sum PM emission for the previous twelve month period. This will be accomplished by summing the monthly PM emissions data for the previous twelve months. This number shall be used to demonstrate compliance with Special Condition 2(A).

PM emissions shall be recorded and maintained in a written or electronic form at the facility for a period of ten years.

Recordkeeping – Emission Factor Obtained from AP-42

On each day of operation, the Permittee shall record and maintain records of the total quantity of materials used or hours of operation for each emissions unit. The Permittee may request an extension of the record completion date by submitting the request in writing to the Staff Director. The request must be received at least ten days prior to the 20th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 20th of the month, the Permittee shall calculate and record the following:

1. The total usage of pollutant containing materials or hours of operation for the previous calendar month using the daily production records. The record shall indicate the emission factor used to demonstrate compliance with Special Condition 2(A). Emission factors obtained from the most recent edition of AP-42, *Compilation of Air Pollutant Emission Factors*, must be approved by the Air Pollution Control Program prior to use in any compliance demonstrations to ensure that the most representative emission factor is being used. The emission factors listed in Table B are approved for use with the appropriate emission units. Documentation sufficient to support the emission factors must accompany Attachment A required by Special Condition 2(B).
2. The pollutant emissions for each emissions unit and the total facility for the previous month. Pollutant emissions shall be determined by multiplying the

quantity of materials used or hours of operation by an emissions factor, as represented in the following equation:

$$\text{Pollutant emissions} = \text{Materials Used or Hours of Operation} \times \text{Emission Factor}$$

A control or capture efficiency may be taken into account only if the emission factor used to determine the emissions is based on uncontrolled emissions.

Total facility pollutant emissions shall be calculated by summing the pollutant emissions from each emissions unit.

3. The twelve month rolling sum of pollutant emission for the previous twelve month period. This will be accomplished by summing the monthly pollutant emissions data for the previous twelve months. This number shall be used to demonstrate compliance with Special Condition 2(A).

Emissions shall be recorded and maintained in a written or electronic form at the facility for a period of ten years.

Recordkeeping – Emission Factor Obtained from Testing or Manufacturer’s Data

On each day of operation, the Permittee shall record and maintain records of the total quantity of materials used or hours of operation for each emissions unit. The Permittee may request an extension of the record completion date by submitting the request in writing to the Staff Director. The request must be received at least ten days prior to the 20th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 20th of the month, the Permittee shall calculate and record the following:

1. The total usage of pollutant containing materials or hours of operation for the previous calendar month using the daily production records. The record shall indicate the emission factor used to demonstrate compliance with Special Condition 2(A).
 - a. Emission factors must be obtained from the most recent test performance as specified under Special Condition 10 and 11. Emission factors must be approved by the Air Pollution Control Program prior to use in any compliance demonstrations. The emission factors listed in Table B are approved for use with the appropriate emission units. A copy of the approved test results must accompany Attachment A required by Special Condition 2(B).
 - b. Emission factors obtained from manufacturer’s data must be approved by the Air Pollution Control Program prior to use in any compliance demonstrations. The emission factors listed in Table B are approved for use with the appropriate emission units. A copy of the manufacturer’s data must accompany Attachment A required by Special Condition 2(B).

2. The pollutant emissions for each emissions unit and the total facility for the previous month. Pollutant emissions shall be determined by multiplying the quantity of materials used or hours of operation by an emissions factor, as represented in the following equation:

$$\textit{Pollutant emissions} = \textit{Materials Used or Hours of Operation} \times \textit{Emission Factor}$$

Total facility pollutant emissions shall be calculated by summing the pollutant emissions from each emissions unit.

3. The twelve month rolling sum of pollutant emission for the previous twelve month period. This will be accomplished by summing the monthly pollutant emissions data for the previous twelve months. This number shall be used to demonstrate compliance with Special Condition 2(A).

Emissions shall be recorded and maintained in a written or electronic form at the facility for a period of ten years.

Attachment B: Pre-Approved Changes

Ford Motor Company Kansas City Assembly Plant

Clay County, S27, T51, R32

Project Number: 2010-11-043

Installation ID Number: 047-0019

Permit Number:

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS		
				FEDERAL	STATE OF MISSOURI	
(1) Install	(a)	EU0010 Passenger Body Shop	(1) welding and/or grinding equipment	PM		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
			(2) sealer application equipment	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
	(b)	EU0020 Passenger Electrocoat (E-Coat)	(1)(E-Coat) oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx, CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
			(2) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
	(c)	EU0030 Passenger Sealer	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(3) sealer oven using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
			(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230, 10 CSR 10-3.060 [Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
	(d)	Passenger PVC Enclosure	(1) lower body side PVC application equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(2) PVC oven using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS		
				FEDERAL	STATE OF MISSOURI	
(e)	EU0050 Passenger Guidecoat	(3) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]	
		(1) new applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]	
		(2) guidecoat booth	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]	
		(3) guidecoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]	
		(4) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM		
		(5) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]	
	(f)	EU0060 Passenger Topcoat	(1) new applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(2) one or two topcoat booths	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(3) topcoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating] 10 CSR 10-6.260 [Restriction of Emission of Sulfur Compounds]
			(4) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	
			(5) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
(g)	EU0070 Passenger Wax	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(h)	EU0080 Passenger Blackout	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(i)	EU0090 Passenger Final Repair	(1) new applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(j)	EU0100 Passenger Glass Install	applicator automation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		applicators	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(k)	EU0120 Commercial Body Shop	(1) welding and/or grinding equipment	PM		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
		(2) sealer application equipment	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
(l)	EU0130 Commercial Electrocoat (E-Coat)	(1) (E-Coat) oven burners	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(2) emission control equipment	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(m)	EU0140 Commercial Sealer	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) sealer oven	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(n)	EU0150 Commercial Guidecoat	(1) new applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) guidecoat booth	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) guidecoat Oven Burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(4) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	
		(5) emission control equipment	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
(o)	EU0160 Commercial Topcoat	(1) new applicators or automation equipment	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) one or both topcoat booths	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) topcoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(4) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	
		(5) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(p)	EU0170 Commercial Blackout	(1) applicators	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(q)	EU0180 Commercial Final Repair	(1) applicators	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub III, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(r)	EU0230 E-Lab Boiler	natural gas fired boiler with propane and/or fuel oil backup	PM10, PM2.5, SOx, NOx CO		10 CSR 10-6.260 [Restriction of Emission of Sulfur Compounds], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
(s)	EU0240 Fitness Room Boiler	natural gas fired boiler with propane and/or fuel oil backup	PM10, PM2.5, SOx, NOx CO		10 CSR 10-6.260 [Restriction of Emission of Sulfur Compounds], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(t)	EU0250 Solvent Cold Cleaners	solvent cold cleaner	VOC, HAP		10 CSR 10-2.210 [Control of Emissions From Solvent Metal Cleaning]
(u)	EU0270 Scuff Booths (5)	scuff booths using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
(v)	Passenger Scrap Paint Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub III	
(w)	Passenger Spent Solvent Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub III	
(x)	Passenger Phosphate Boiler	boiler using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 60 Sub Dc	10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(y)	Passenger Fluid Fill	dispensing equipment	VOC, HAP		
(z)	Passenger Paint Mix Room	mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub III	
		mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub III	
(aa)	Commercial Scrap Paint Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub III	
(bb)	Commercial Spent Solvent Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub III	
(cc)	Commercial Phosphate Boiler	boiler using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 60 Sub Dc	10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(dd)	Commercial	dispensing	VOC, HAP		

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
	Fluid Fill	equipment			
(ee)	Commercial Paint Mix Room	mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub III	
		mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub III	
(ff)	Petroleum Tanks (3)	tank and piping.	VOC, HAP		
(gg)	Waste Oil AST	tank and piping.	VOC, HAP		
(hh)	Wastewater Treatment Plant	WWTP equipment			
(ii)	Product Storage Tanks	tank and piping.	VOC, HAP		
(jj)	Space Heaters	space heaters using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(kk)	Boilers	boilers using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(ll)	Air Supply Houses	booth air supply houses using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(mm)	Hot Water Heaters	hot water heaters using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(nn)	Sprayable Bedliner	sprayable bedliner booth and application equipment	VOC, HAP, PM	40 CFR 63 Sub III	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
(oo)	Glass Roof/Panel Installation	glass installation equipment for glass roof or other glass panel	VOC, HAP	40 CFR 63 Sub III	
(pp)	UV Cure Coating Application/ Oven	UV Cure coatings, application equipment, and curing equipment	VOC, HAP, PM	40 CFR 63 Sub III	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(qq)	Body Shop	new body shop for future vehicle using natural gas and/or propane	VOC, HAP, PM, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub III	10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(rr)	Stamping Operations	new stamping operations using natural gas and/or propane	VOC, HAP, PM, PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

(2) Modify	(a)	EU0010 Passenger Body Shop	(1) welding and/or grinding equipment	PM		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]

(2) sealer application equipment

VOC, HAP

40 CFR 63 Sub III

10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From

PRE-APPROVED CHANGE	REGULATED SUBSTANCES	APPLICABLE STANDARDS	
		FEDERAL	STATE OF MISSOURI

					Industrial Processes]
(b)	EU0020 Passenger Electrocoat (E-Coat)	(1) (E-Coat) oven (e.g., extend oven) using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(2) (E-Coat) dip tank	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) (E-Coat) oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(c)	EU0030 Passenger Sealer	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) sealer oven using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230, 10 CSR 10-3.060 [Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(d)	EU0040 Passenger PVC Enclosure	(1) lower body side PVC application equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) PVC oven using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(3) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(e)	EU0050 Passenger Guidecoat				

(1) existing applicators or automation equipment VOC, HAP 40 CFR 63 Sub IIII, 40 CFR 60 Sub 10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]. 10 CSR 10-2.230

PRE-APPROVED CHANGE		REGULATED SUBSTANCES	APPLICABLE STANDARDS		
			FEDERAL	STATE OF MISSOURI	
				MM	[Control of Emissions From Industrial Surface Coating Operations]
		(2) applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) guidecoat booth back sections	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(4) guidecoat booth	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(5) guidecoat oven (e.g., extend oven) using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(6) guidecoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(7) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	
		(8) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(f)	EU0060 Passenger Topcoat	(1) existing applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) topcoat booth back sections	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(4) one or both topcoat booths	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS				
				FEDERAL	STATE OF MISSOURI			
			(5) topcoat ovens (e.g., extend oven) using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]		
			(6) topcoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]		
			(7) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM			
			(8) spot repair operation.	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]		
			(9) guidecoat system	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]		
			(10) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]		
			(g)	EU0070 Passenger Wax	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
					(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(h)	EU0080 Passenger Blackout	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
					(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(i)	EU0090 Passenger Final Repair	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]			

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS		
				FEDERAL	STATE OF MISSOURI	
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]	
		(3) oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]	
	(j)	EU0100 Passenger Glass Install	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
	(k)	EU0120 Commercial Body Shop	(1) welding and/or grinding equipment	PM		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
			(2) existing welding or grinding equipment	PM		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes]
			(3) sealer application equipment	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(4) existing sealer application equipment	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
	(l)	EU0130 Commercial Electrocoat (E-Coat)	(1) (E-Coat) oven (e.g., extend oven) using natural gas and/or propane	PM10, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
			(2) (E-Coat) dip Tank	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(3) (E-Coat) oven burners using natural gas and/or propane			PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]	
(4) emission control equipment using natural gas and/or propane			VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]	

PRE-APPROVED CHANGE		REGULATED SUBSTANCES	APPLICABLE STANDARDS		
			FEDERAL	STATE OF MISSOURI	
(m)	EU0140 Commercial Sealer	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) sealer oven using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(n)	EU0150 Commercial Guidecoat	(1) existing applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) guidecoat booth back sections	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(4) guidecoat booth	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(5) guidecoat oven (e.g., extend oven) using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(6) guidecoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(7) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
(o)	EU0160 Commercial Topcoat	(8) topcoat system	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(9) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(1) existing applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicators or automation equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) topcoat booth back sections	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(4) one or both topcoat booths	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(5) topcoat ovens (e.g., extend oven) using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(6) topcoat oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
		(7) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	
		(8) spot repair operation.	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(9) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]		

PRE-APPROVED CHANGE		REGULATED SUBSTANCES	APPLICABLE STANDARDS	
			FEDERAL	STATE OF MISSOURI

(p)	EU0170 Commercial Blackout	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
(q)	EU0180 Commercial Final Repair	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
		(3) oven burners using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(r)	EU0190 Commercial Glass Install	(1) applicators	VOC, HAP	40 CFR 63 Sub IIII	
		(2) applicator automation	VOC, HAP	40 CFR 63 Sub IIII	
(s)	EU0230 E-Lab Boiler	natural gas fired boiler with propane and/or fuel oil backup	PM10, PM2.5, SOx, NOx CO		10 CSR 10-6.260 [Restriction of Emission of Sulfur Compounds], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(t)	EU0240 Fitness Room Boiler	natural gas fired boiler with propane and/or fuel oil backup	PM10, PM2.5, SOx, NOx CO		10 CSR 10-6.260 [Restriction of Emission of Sulfur Compounds], 10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(u)	EU0250 Solvent Cold Cleaners	solvent cold cleaner	VOC, HAP		10 CSR 10-2.210 [Control of Emissions From Solvent Metal Cleaning]
(v)	EU0260 Gasoline UST (3)	tank and piping.	VOC, HAP		10 CSR 10-2.330 [Control of Gasoline Reid Vapor Pressure]
(w)	EU0270 Scuff	scuff booths using natural gas and/or	PM10, PM2.5,		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS	
				FEDERAL	STATE OF MISSOURI
	Booths (5)	propane	SOx, NOx CO		Industrial Processes]
(x)	EU0290 20,000 Gallon Windshield Washer Fluid UST	tank and piping.	VOC, HAP	40 CFR Sub EEEE	
(y)	Passenger Scrap Paint Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
(z)	Passenger Spent Solvent Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
(aa)	Passenger Phosphate System	conversion to ZrO2 system			
(bb)	Passenger Phosphate Boiler	boiler using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 60 Sub Dc	10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(cc)	Passenger Fluid Fill	dispensing equipment	VOC, HAP		
(dd)	Passenger Paint Mix Room	mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub IIII	
(ee)	Commercial Scrap Paint Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
(ff)	Commercial Spent Solvent Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
(gg)	Commercial Phosphate System	conversion to ZrO2 system			
(hh)	Commercial Phosphate Boiler	boiler using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO	40 CFR 60 Sub Dc	10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(ii)	Commercial Fluid Fill	dispensing equipment	VOC, HAP		
(jj)	Commercial Paint Mix Room	mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub IIII	
		mix tanks and circulation equipment	VOC, HAP	40 CFR 63 Sub IIII	
(kk)	Petroleum Tanks (3)	tank and piping.	VOC, HAP		
(ll)	Waste Oil AST	tank and piping.	VOC, HAP		
(mm)	Wastewater Treatment Plant	WWTP equipment			
(nn)	Product Storage Tanks	tank and piping.	VOC, HAP		
(oo)	Space Heaters	space heaters using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
(pp)	Boilers	boilers using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

PRE-APPROVED CHANGE			REGULATED SUBSTANCES	APPLICABLE STANDARDS		
				FEDERAL	STATE OF MISSOURI	
	(qq)	Air Supply Houses	booth air supply houses using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]
	(rr)	Hot Water Heaters	hot water heaters using natural gas and/or propane	PM10, PM2.5, SOx, NOx CO		10 CSR 10-2.040 [Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating]

(3) Changes Materials	(a)		Use of a new raw material or ingredient in a coating operation	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
	(b)		Use of a new coating material	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From Industrial Processes], 10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
	(c)		Use of new vehicle fluid	VOC, HAP		
	(d)		Use of new cold cleaner solvents	VOC	40 CFR 63 Sub IIII	10 CSR 10-2.210 [Control of Emissions from Solvent Metal Cleaning]
	(e)		Use of new general solvents	VOC, HAP	40 CFR 63 Sub IIII	10 CSR 10-2.215 [Control of Emissions from Solvent Cleanup Operations]

Notes:

[1]	The terms install, construct, and modify, for purposes of this table, have operational rather than regulatory meaning. For example, in some cases one or more of the listed installation projects might meet the regulatory definition of a modification rather than construction, according to its applicable regulation.
[2]	Means each tank, reservoir, or container used for the storage of volatile organic liquids, not including frames, housing, auxiliary supports, or other components that are not directly involved in the containment of liquids or vapors.

Mr. Robert Streight
Permit Manager
Ford Motor Company
290 Auto Club Drive, Suite 800
Dearborn, MI 48126

RE: New Source Review Permit - Project Number: 2010-11-043

Dear Mr. Streight:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact Emily Wilbur, at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:ewl

Enclosures

c: Kansas City Regional Office
PAMS File: 2010-11-043

Permit Number: