STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

APR 0 6 2015

Mr. Daniel Jowiski
Ford Motor Co. - Kansas City Assembly Plant
P.O. Box 11009, Antioch Station
Claycomo, MO 64119

Re: Ford Motor Co. - Kansas City Assembly Plant, 047-0019
Permit Number: **OP2014-035**

Dear Mr. Jowiski:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 have any questions or need additional information regarding this permit, please do not hesitate to contact Jill Wade at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:jwk

Enclosures

c: Kansas City Regional Office
PAMS File: 2013-04-097

Missouri Department of Natural Resources
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2014-035
Expiration Date: APR 0 6 2020
Installation ID: 047-0019
Project Number: 2013-04-097

Installation Name and Address
Ford Motor Co. - Kansas City Assembly Plant
P.O. Box 11009, Antioch Station
Claycomo, MO 64119
Clay County

Parent Company's Name and Address
Ford Motor Company
One American Road
Dearborn MI, 48126

Installation Description:
Ford Motor Company (Ford) owns and operates an automobile assembly plant in Claycomo, Missouri. Ford's Kansas City Assembly Plant builds vans (Passenger) and light duty trucks (Commercial). The plant operations include vehicle assembly in two independent lines, passenger and commercial. One building houses primarily Transit body, painting and assembly, and the truck phosphate and E-coat processes and truck assembly. The two other buildings are used primarily for truck body and truck guidecoat and topcoat operations, respectively. The facility is major all criteria pollutants. Units at this facility are subject to 40 CFR Part 63 Subparts IIII, EEEE, DDDDD, and ZZZZ; 40 CFR Part 60 Subpart MM; and 40 CFR Part 64 Compliance Assurance Monitoring (CAM).

Prepared by
Jill Wade, P.E.
Environmental Engineer

Director or Designee
Department of Natural Resources

APR 0 6 2015
Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Ford Motor Company (Ford) owns and operates an automobile assembly plant in Claycomo, Missouri. Ford's Kansas City Assembly Plant builds vans (Passenger) and light duty trucks (Commercial). The plant operations include vehicle assembly in two independent lines, passenger and commercial. One building houses primarily Transit body, painting and assembly, and the truck phosphate and E-coat processes and truck assembly. The two other buildings are used primarily for truck body and truck guidecoat and topcoat operations, respectively. The facility is major all criteria pollutants. Units at this facility are subject to 40 CFR Part 63 Subparts IIII, EEEE, DDDDD, and ZZZZ; 40 CFR Part 60 Subpart MM; and 40 CFR Part 64 Compliance Assurance Monitoring (CAM).

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter < Ten Microns (PM10)	58.45	61.95	78.67	68.53	65.14
Particulate Matter < 2.5 Microns (PM2.5)	54.90	56.67	74.56	68.53	65.14
Sulfur Oxides (SOx)	0.47	0.33	0.51	0.44	0.41
Nitrogen Oxides (NOx)	77.06	53.21	81.79	73.73	67.56
Volatile Organic Compounds(VOC)	929.55	1029.94	1529.78	1407.46	1347.53
Carbon Monoxide (CO)	64.55	44.55	68.56	61.94	56.75
Lead (Pb)	0	0.0001	0.0003	0	0
Hazardous Air Pollutants (HAPs)	0.10	0.0001	0.032	0.0004	0.016
Ammonia (NH3)	2.45	1.70	2.61	2.36	2.16

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Unit No.	Emission Unit Description	Associate Emissions Point(s)	Associated Emission Point No.
EU0100	Passenger Body Shop	Passenger Body Shop Welding and Grinding	EP-59
		Passenger Body Shop Sealer	EP-49
EU0020	Passenger Electrocoat (E-Coat)	Passenger E-Coat Tank	EP-02
		Passenger E-Coat Oven	EP-03
EU0030	Passenger Sealer	Passenger Sealer Deck	EP-04
		Passenger Sealer Oven	EP-04
EU0040	Passenger PVC Enclosure	Passenger PVC Booth	EP-05
		Passenger PVC Oven	EP-06
EU0050	Passenger Guidecoat	Passenger Guidecoat Booth	EP-07
		Passenger Guidecoat Purge and Clean	EP-54
EU0060	Passenger Topcoat	Passenger Topcoat Booth	EP-09
		Passenger Oven (3-Wet)	EP-11
		Passenger Topcoat Purge and Clean	EP-54
		Passenger Spot Repair	EP-24
EU0070	Passenger Wax	Passenger Wax	EP-13
EU0080	Passenger Blackout	Passenger Blackout Booth	EP-31
EU0090	Passenger Final Repair	Passenger Final Repair Booth	EP-26
		Passenger Final Repair Oven	EP-27
EU0100	Passenger Glass Install	Passenger Windshield Glass Install	EP-55
		Passenger Quarterglass Install	EP-48
EU0110	Passenger Ditch Molding	Passenger Ditch Molding	EP-47
EU0120	Commercial Body Shop	Commercial Body Shop Welding and Grinding	EP-60
		Commercial Body Shop Sealer	EP-56
EU0130	Commercial Electrocoat (E-Coat)	Commercial E-Coat Tank	EP-15
		Commercial E-Coat Oven	EP16
EU0140	Commercial Sealer	Commercial Sealer Deck	EP-17
		Commercial Sealer Oven	EP-17
EU0150	Commercial Guidecoat	Commercial Guidecoat Booth	EP-18
		Commercial Guidecoat Oven	EP-19
		Commercial Guidecoat Purge and Clean	EP-57

Emission Unit No.	Emission Unit Description	Associate Emissions Point(s)	Associated Emission Point No.
EU0160	Commercial Topcoat	Commercial Topcoat Booth	EP-20
		Commercial Tutone Booth	EP-21
		Commercial Topcoat Oven	EP-22
		Commercial Tutone Oven	EP-23
		Commercial Spot Repair	EP-24
		Commercial Topcoat Purge and Clean	EP-57
EU0170	Commercial Blackout	Commercial Blackout Booth	EP-25
EU0180	Commercial Final Repair	Commercial Final Repair Booth	EP-26
		Commercial Final Repair Oven	EP-27
EU0190	Commercial Glass Install	Commercial Windshield Glass Install	EP-58
EU0260	Gasoline UST (3)	Gasoline UST (3)	EP-37
EU0270	Scuff Booths (5)	Scuff Booths (5)	EP-40
EU0280	Seven 20 MMBtu/hr Space Heaters	Seven 20 MMBtu/hr Space Heaters	EP-34
EU0290	20,000 Gallon Windshield Washer Fluid UST	20,000 Gallon Windshield Washer Fluid UST	EP-44
EU0300	Miscellaneous Solvent Use	Miscellaneous Solvent Use	EP-42
EU0310	Fluidized Bed Skid Cleaner	Fluidized Bed Skid Cleaner	EP-53
EU0330	Passenger Spent Solvent Tank	Passenger Spent Solvent Tank	EP-38
EU0340	Passenger Paint Mix Room	Passenger Paint Mix Room	EP-46
EU0350	Commercial Scrap Paint Tank	Commercial Scrap Paint Tank	EP-38
EU0360	Commercial Spent Solvent Tank	Commercial Spent Solvent Tank	EP-38
EU0370	Commercial Paint Mix Room	Commercial Paint Mix Room	EP-46
EU0380	Paint Stripper	Paint Stripper	EP-29
EU0390	Phosphate Boilers (4)	Passenger and Commercial Phosphate Boilers	EP-61
EU0400	Miscellaneous Boilers and Process Heaters	MACT Applicable Boilers and Process Heaters	EP-62
EU0410	Emergency Generators and Fire Pumps	Existing Emergency Generators and Fire Pumps	EP-200
		New Emergency Generators and Fire Pumps	EP-200
EU0420	Haul Roads	Haul Roads	FUG-01

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source
Passenger and Commercial Body Shop Welding and Grinding (EP-59 and EP-60)
Passenger Phosphate System (EP-01)
Passenger Fluid Fill (EP-50)
Commercial Phosphate System (EP-14)
Commercial Fluid Fill (EP-50)
Petroleum Tanks (3) (EP-43)
Used Oil AST (EP-45)
Wastewater Treatment Plant (EP-51)
Space Heaters (EP-34)
Miscellaneous Solvent Use (EP-42)
Metal Stamping Operations (EP-100)

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION PW001
10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 042008-001, Issued March 31, 2008
Construction Permit No. 072011-009, Issued July 20, 2011

1. Annual Emission Limitation – Plant Wide Applicability Limitation (PAL)
   A. The permittee 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)
Volatile Organic Compounds (VOC)	2,363
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

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. The permittee shall track and calculate from the entire installation the monthly and consecutive twelve month emissions of each pollutant listed in Table 1. Attachments A1 and A2, or equivalent forms approved by the permitting authority shall be used to demonstrate compliance with the emission limits.

C. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records from Special Condition Number 2.B of Construction Permit 072011-009 indicate that the source exceeds the limitation of Special Conditions Number 2.A of Construction Permit 072011-009.

D. The permittee shall keep documentation of any emission factors used to demonstrate compliance with Special Condition 2.A of Construction Permit 072011-009. 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 Attachments A1 and A2 required by Special Condition 2.B of Construction Permit 072011-009.

E. The permittee shall keep documentation of any overall control efficiencies used to demonstrate compliance with Special Condition 2.A of Construction Permit 072011-009. 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 Attachments A1 and A2 required by Special Condition 2.B of Construction Permit 072011-009.

F. The permittee 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.

2. Operational Requirement

A. The permittee shall keep the ink, solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable easily read permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

3. Annual Limitation on Natural Gas Usage

A. The permittee shall not exceed a usage rate of 3,478 million standard cubic feet of natural gas in any 12-month rolling period.

B. The permittee shall track natural gas usage from the entire installation on a monthly and consecutive 12-month basis. Attachment B, or equivalent forms approved by the permitting authority shall be used to demonstrate compliance with the natural gas usage limit.

C. The permittee 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 indicate that the source exceeds the natural gas usage limit.

4. Pre-Approved Operational and Equipment Modifications

A. The permittee is authorized to perform the physical or operational changes, or changes deemed consistent with those physical or operational changes, listed in Attachment C, *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 of Construction Permits 072011-009 and 042008-001.

B. The permittee 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, the permittee 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 D, or equivalent forms approved by the permitting authority, may be used for this purpose.

C. The permittee shall notify the permitting authority of all activities associated with any Pre-Approved Change according to Special Conditions 5, 6 and 7 of Construction Permits 072011-009 and 042008-001.

D. If the permittee wishes to make physical or operational changes that are not deemed consistent with the physical or operational changes listed in Attachment C of this construction permit and are not exempt from the construction permit rule, then the

permittee 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
   A. The permittee 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 C. The notification shall contain the following:
      1) Detailed description of the physical or operational change including the effect 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 of Construction Permit 072011-009;
      6) An emissions calculation sheet for the pre-approved change including any modeling required by Special Condition 7 of Construction Permit 072011-009;
      7) A calculation sheet for the potential emissions of all criteria air pollutants except VOC for the pre-approved change;
      8) A summation of the potential emissions from completed and proposed pre-approved changes;
      9) 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 of Construction Permit 072011-009; and
      10) A summary of the impact analysis on the capture efficiency as outlined in Special Condition 9.D of Construction Permit 072011-009.
   B. This notification shall become an enforceable part of this construction permit upon receipt by the permitting authority and the permittee 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, the permittee 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. The permittee 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 C. The notification shall contain the following:
      1) Reference to the notification of actual construction including date of notification and brief description of change;
      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 the permittee to construct, modify or operate the installation not in accordance with the notification of 7.A. above.

7. Alternative Notification Requirements
   A. The permittee 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 of Construction Permit 072011-009, the permittee shall:
      1) Submit a list of 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 of Construction Permits 072011-009 and 042008-001; and
      2) Maintain a log of exempt units at the installation as required in Special Condition 4.B of Construction Permits 072011-009 and 042008-001.

8. Ambient Air Quality Analysis Requirement for Individual Hazardous Air Pollutant(s) (HAPs) prior to submitting notification of a pre-approved change, the permittee must evaluate HAP emissions for the pre-approved change, not subject to a MACT, according to the following methodology:
   A. For all HAPs listed in *Draft Acceptable Ambient Levels for Missouri* with a potential to emit greater than their respective threshold levels, the permittee shall perform screen modeling using the methods outlined in Special Condition 8 to determine the one-hour, eight-hour, 24-hour, and/or annual concentration of any individual HAP. The results of the screen modeling must be submitted with the notification required in Special Condition 5 of Construction Permit 072011-009 for all pre-approved changes containing HAP, not subject to a MACT.
   B. The eight-hour, 24-hour and/or annual concentrations shall be compared to the current, available Risk Assessment Levels for each HAP listed in *Draft Acceptable Ambient Levels for Missouri*.
   C. If the screen modeling indicates that the emissions from the pre-approved change at the installation exceed acceptable concentration levels as stated in the most current version of *Draft Acceptable Ambient Levels for Missouri*, then the permittee must submit and obtain approval for either of the following options prior to submitting notification of construction (Special Condition 5 of Construction Permit 072011-009):
      1) Refined modeling, or
      2) An amendment to the flexible construction permit to include a federally enforceable limit on HAP emissions.

9. Screen Modeling Method for Individual HAPs
   A. The permittee shall use the preferred screening method stated in 40 CFR Part 51 Appendix W, "*Guideline on Air Quality Models*".
   B. The emission rate to be used in the model shall be the potential to emit of the individual HAP. Stack parameters used in the model shall be representative of actual stack parameters including height, diameter, flow rate/velocity, temperature, etc. If the permittee wishes to use values other than the default values for any parameter with a default value, the permittee shall submit justification and obtain approval for the proposed value prior to use in the model.

10. Potential Emission Calculation Requirements for Pre-Approved Changes

A. Prior to the submission of a notification for the construction of a pre-approved change, the permittee 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 of Construction Permit 072011-009 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

i. For new emission units, the emission rate of the equipment at maximum design capacity assuming continuous year-round operation (8760 hours);

ii. 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 hours) less the 24-month average baseline actual emissions for the existing emission unit, as defined by 40 CFR 52.21(b)(48)(iii);

iii. In determining the project PTE, the permittee 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. The permittee must indicate which equipment will be rendered inoperable or removed in the notification for construction required in Special Condition 5 of Construction Permit 072011-009. The permittee must remove or render the equipment inoperable prior to start of operation of the project equipment. The permittee may not re-install or restart the equipment without prior notification and approval.

2) Actual-to-Projected Actual Test

i. 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);

ii. In determining the project PTE, the permittee 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;

iii. In determining the project PTE, the permittee 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. The permittee must indicate which equipment will be rendered inoperable or removed in the notification for construction required in Special Condition 5. The permittee must remove or render the equipment inoperable prior to start of operation of the project equipment. The permittee may not re-install or restart the

equipment without prior notification and approval.

D. The permittee shall compare the PTE of the project as determined in Special Condition 8.C of Construction Permit 072011-009 to the significance level of each PAL pollutant as stated in Table 2. The permittee must submit refined modeling in accordance with Special Condition 9 of Construction Permit 072011-009 for each PAL pollutant whose project PTE as determined in Special Condition 8.C of Construction Permit 072011-009 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 year of CO_2e as defined in CFR 52.21(b)(49)(ii), the permittee will be required to submit an application for authority to construct prior to construction of the pre-approved change

11. Refined Modeling Requirements

A. The permittee must perform modeling for each PAL pollutant whose PTE exceeds the Table 2 significance levels as determined in subsection (C) of Special Condition 8 of Construction Permit 072011-009 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, the permittee will be required to submit additional modeling, demonstrating compliance with, but not limited to, the National Ambient Air Quality 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. The permittee assumes all liabilities in constructing prior to approval of a compliant modeling analysis.

D. If the permittee cannot demonstrate compliance with the appropriate standard(s) for a particular PAL pollutant, the permittee 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. The permittee will be required to submit a report to the Air Pollution Control APCP Enforcement Section within 90 days of the initial notification of the project indicating which requirement, stated in subsection (D) of this condition, the permittee intends to meet.

1) For the monitoring requirement in (D)(1), 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) The permittee 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) The permittee 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) The permittee shall report the data collected in accord with this special condition to the department on a quarterly basis.

d) If concentrations are monitored that exceed a NAAQS, the permittee 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. The permittee 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, the permittee shall keep records of haul road emissions as outlined in Special Condition 23.A of Construction Permit 072011-009. This includes road activity associated with the plant. The permittee shall record this information in parallel to the requirements of Special Condition 2 and 23.A of Construction Permit 072011-009 for the duration of the PAL pollutant monitoring program. The permittee shall submit this information quarterly to the department. Upon demonstration of compliance with the appropriate standard(s), the permittee may request to end the monitoring program.

2) For the modeling requirement in (D)(2), the report shall include:
   a) A compliance plan for demonstrating compliance with the applicable standards. The permittee shall implement any such plan immediately upon its approval by the Director; and
   b) A compliant modeling demonstration supporting the proposed post-reduction emission rates.

13. Capture and Control Equipment

A. The specified control device (e.g. baghouse, thermal oxidizer, carbon adsorber, and/or fluidized bed carbon concentrator) 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 10 of Construction Permit 072011-009 and Special Condition 9 of Construction Permit 042008-001.

B. Thermal Oxidizer Requirements

1) The operating temperature shall be continuously monitored and recorded when a control efficiency is claimed for compliance with the VOC emissions limitation. The operating temperature of the thermal oxidizer shall be maintained on a rolling three-hour average within fifty degrees Fahrenheit of the average temperature of the oxidizer recorded during the compliance test specified in Special Condition 10. The acceptable temperature range may be re-established by performing a new set of emission tests. The most recent sixty months of records shall be maintained on-site and shall be made immediately available to Missouri Department of Natural Resources' personnel upon request.

2) An assessment of thermal oxidizer valve operation and leakage shall be conducted as part of the maintenance and inspection activities, at least once every 18 months.

C. Carbon Adsorber and Fluidized Bed Concentrator Requirements

1) Ford Motor shall monitor the desorption air temperature from the carbon adsorption and/or fluidized bed concentrator unit with an appropriate monitoring device to ensure that proper temperature is maintained to demonstrate "breakthrough" has not occurred when a control efficiency is claimed for compliance with the VOC emissions limitation.

3) The desorption gas inlet temperature shall be continuously monitored and recorded when a control efficiency is claimed for compliance with the VOC emissions limitation. The recorders shall be installed within one hundred eighty days of the issuance of the operating permit. The desorption gas inlet temperature of the carbon adsorber and/or fluidized bed concentrator shall be maintained on a rolling three-hour average within fifteen degrees Fahrenheit of the average temperature of the inlet temperature recorded during the compliance test specified in Special Condition 10 of Construction Permit 072011-009. The acceptable temperature range may be re-established by performing a new set of emission tests. The most recent sixty months of records shall be maintained on-site and

shall be made immediately available to Missouri Department of Natural Resources' personnel upon request.

D. 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, the permittee 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. Attachment E or an equivalent recordkeeping form shall be used to record the pressure drop (or other parameter specified by the manufacturer).
4) For all controls where compliance is based on a control efficiency, the permittee shall maintain an operating and maintenance log (using Attachment F or an equivalent form) 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, and replacements, etc.

E. Capture Equipment Requirements

1) When a control efficiency is claimed for compliance, the permittee 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 of Construction Permit 072011-009.
2) For all controls where compliance is based on a control efficiency, the permittee 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, the permittee 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, the permittee shall maintain an operating and maintenance log (using Attachment F or an equivalent form) 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 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.

14. Performance Testing

A. The permittee shall conduct performance tests on existing control devices in the following table and any future control devices used for compliance, based on device control efficiencies with the PAL.

Control Device	Location Description
Thermal Oxidizer	Passenger E-Coat Oven RTO
	Passenger Topcoat Ovens RTO
	Commercial E-Coat Oven RTO
	Commercial Guidecoat Booth RTO
	Commercial Guidecoat Ovens RTO
Carbon Wheel	Commercial Guidecoat Booth Carbon Wheel 1
	Commercial Guidecoat Booth Carbon Wheel 2
	Commercial Topcoat Carbon Wheel 3
	Commercial Topcoat Carbon Wheel 4
	Commercial Topcoat Carbon Wheel 5
	Commercial Topcoat Carbon Wheel 6

The permittee shall determine the VOC and HAP 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 A1 for compliance. (Note: VOC destruction and removal efficiency test results will be used for both VOC and HAP emission calculations when required)

B. For each capture system, where compliance is based on capture efficiency, the permittee 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 A1 for compliance. (Note: If the performance tests have been completed on existing equipment the issuance of this operating permit does not require re-testing. If new equipment is installed the permittee shall conduct initial testing on that equipment.)

C. The testing required in Special Condition 11.B of Construction Permit 072011-009 may be limited to conducting tests on a representative stack(s) of each type of equipment, if requested by the permittee and upon approval by the Director.

D. 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 VOC to a control device, a capture efficiency of 100 percent may be assumed.
For any control device installed subsequent to the issuance of this construction permit, performance tests shall be performed within sixty days after installation, but not later than one hundred eighty days after initial start-up of the control equipment.

E. Testing shall be conducted in accordance with the procedures outlined in Special Condition 11 of Construction Permit 072011-009. The permittee shall maintain a record of the results of all performance tests required by Special Conditions 10.A. and 10.B of Construction Permit 072011-009.

15. Proposed Test Plan

A. A completed Proposed Test Plan Form must be submitted to the Air Pollution Control Program's Enforcement Section, within thirty days prior to the proposed test date so that the Air Pollution Control Program's 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 staff 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 staff director within thirty days of completion of any required testing, unless an extension is requested and approved by the staff 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.

16. Startup, Shutdown, and Malfunction Requirement

A. The permittee 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.*

17. Reopening of the Construction Permit
    A. The permitting authority may reopen Construction Permits 072011-009 and 042008-001to accomplish the following actions:
        1) Revise Special Condition 2 to reflect an increase in the PAL as outlined in Special Condition 19 of Permit 072011-009 and Special Condition 18 of Permit 042008-001.
        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.

18. PAL Effective Period
    The PAL in for VOC Special Condition 2 will be effective for ten years, until March 31, 2018. The PAL for PM-10, PM-2.5, NOx, Sox, and CO in Special Condition 2 will be effective for ten years, until July 20, 2021.

19. Permit Application Submission Requirements
    A. Between six and eighteen months prior to the expiration of the PAL in Special Condition 2 of Construction Permits 072011-009 and 042008-001, the permittee shall submit a complete application for the renewal or expiration of the PAL in Special Condition 2 of Construction Permits 072011-009 and 042008-001. For PAL renewal, the permittee will be required to comply with Special Condition 16. For PAL expiration, the permittee will be required to comply with Special Condition 17.
    B. Once a complete application according to Special Condition 15.A of Construction Permits 072011-009 and 042008-001 is received by the permitting authority, the PAL in Special Condition 2 of Construction Permits 072011-009 and 042008-001 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 15.A of Construction Permits 072011-009 and 042008-001 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, the permittee will be required to comply with Special Condition 17 of Construction Permits 072011-009 and 042008-001.

20. 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 18 of Construction Permits 072011-009 and 042008-001.

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.

21. Expiration of the PAL

A. If the permittee does not wish to renew the PAL, the permittee 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 distrubuting 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 of Construction Permits 072011-009 and 042008-001 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. The permittee 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 of Construction Permits 072011-009 and 042008-001.

22. Increase of the PAL during the Effective Period

A. If the permittee wishes to alter the emission limits to allow the installation to emit more than the PAL for any pollutant, the permittee 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 the permittee's emissions to equal or exceed the PAL in Special Condition 2 of Construction Permits 072011-009 and 042008-001.

2) Determine the Best Available Control Technology (BACT) 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 Construction Permits 072011-009 and 042008-001 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(s).

D. The revised PAL level shall be placed on public notice for at least a thirty day period for submittal of public comment.

23. Requirements for the Early Termination of the PAL

A. If the permittee wishes to terminate the PAL, the permittee will be required to comply with the provisions of State Rule 10 CSR 10-6.060.

B. Activities that are subject to Special Condition 19.A of Construction Permit 072011-009 and Special Condition 18.A of Construction Permit 042008-001 are any physical and/or operational changes performed after issuance of this construction permit and in accordance with this construction permit.

C. Upon termination of the PAL, this construction permit will be void and all previously issued construction permits cited in Special Condition 1 of Construction Permits 072011-009 and 042008-001 will be re-instated.

D. The new construction permit will include a BACT analysis utilizing current technologies, a netting analysis performed by the installation and any other requirements that the permitting authority deems necessary pursuant to 10 CSR 10-6.060 Section 8. The results of the BACT and netting analyses shall be submitted to the permitting authority for review and approval.

E. If the permittee requests termination of the PAL during the effective period, the PAL in Special Condition 2 of Construction Permits 072011-009 and 042008-001 will remain in effect until a valid construction permit is issued by the permitting authority pursuant to 10 CSR 10-6.060.

24. Records Retention Requirement

A. The permittee shall maintain all records required by conditions within this section (requirements of PAL Permits 042008-001 and 072011-009) for not less than ten years and five years for all other conditions in this operating permit unless otherwise specified in a special condition.

B. The permittee shall make these records available immediately to any Missouri Department of Natural Resources' personnel upon request.

25. Reporting Requirement

A. The permittee shall submit a semi-annual emissions report to the permitting authority within thirty days after the end of each reporting period.

B. The reporting periods are January 1 - June 30, and July 1 – December. The report shall contain the following information:
   1) Identification of permittee and the permit number;
   2) Total annual emissions in tons per year based on a twelve-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 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 VOC;
   7) A signed statement by the responsible official certifying the truth, accuracy, and completeness of the information provided in the report.

C. The permittee 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 permittee 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.

26. Quality Assurance/Quality Control Plan

A. The permittee shall maintain an operation and maintenance plan on site at all times. The plan shall be a detailed, specific to the Kansas City Assembly Plant and include the following information:
   1) A preventative maintenance program for avoidance of excess emissions which shall include all maintenance activities, with inspection schedule, repair actions, and replacements inventory.
   2) A range of operating condition and outlet variables for normal operation.
   3) 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.
   4) 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).

27. Haul Road Requirements

A. The permittee shall include haul road emissions in the compliance demonstration for the limits in Special Condition 2 of Construction Permit 072011-009 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 of Construction Permit 072011-009.
   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; and
   v) A Fugitive Dust Control Plan (FDCP) to control emissions from haul roads. The permittee must also provide details on how the plan will be maintained and implemented.

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

C. For each day of operation, the permittee 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. Attachment G or an equivalent form shall be used to record monitoring of the property boundary.

D. Documentation of all corrective actions and daily surveys shall be maintained in a log. The permittee shall water haul roads whenever conditions exist which would cause visible fugitive emissions to enter the ambient air beyond the property boundary.

28. Emission Limitations from Previous Construction Permits

A. VOC Content Limitation from Permit Number: 1089-001A
   1) The permittee shall maintain an emission limit of 8.5 pounds per gallon applied coating solids (24-hour basis) for the Commercial Topcoat (truck topcoat) only.
   2) The permittee must keep records for each coating demonstrating the daily volume-weighted average emission rate in pounds of VOC per gallon applied coating solids for the Commercial Topcoat (truck topcoat) only.

B. VOC Content Limitation from Construction Permit 0690-016 (EU0140 - Commercial Sealer)
   1) The permittee must meet an emission limit of 0.16 kilograms VOC per liter of applied coating solids.

C. VOC Content Limitation from Construction Permit 0594-034
   1) The permittee shall meet an emission limit of 13.1 pounds of VOC per gallon of applied coating solids from the operation of the passenger topcoat system.
   2) The permittee must keep records for each coating demonstrating the daily

volume-weighted average emission rate in pounds of VOC per gallon applied coating solids for the passenger topcoat system.

D. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records from Special Condition 24 of Construction Permit 072011-009 indicate that the source exceeds the emission limitation of Special Condition 24 of Construction Permit 072011-009.

29. Operational Requirements from Previous Construction Permits

A. Stack Identifications from Permit Number: 1089-001A

1) The permittee shall maintain blueprints (or equivalent) showing rooftop locations of all exhaust stacks for both existing and new stacks.

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. Ford must physically identify (i.e., paint, label, etc.) 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 deparment personnel to identify which source is not meeting regulatory requirements, if the situation occurs.

F. Fluidized Bed Skid Cleaner Requirements from Construction Permit 042006-012

1) The permittee shall use the fluidized bed skid cleaner (EP49) exclusively to remove non-chlorinated/non-hazardous coatings from metal parts.

2) Natural gas or propane shall be the only fuels burned in the fluidized bed skid cleaner (EP49).

30. Emergency Equipment Requirements

A. The operating hours of the emergency generator shall not exceed five hundred hours in any consecutive twelve month period. To facilitate the record keeping for this condition, the emergency generator shall be equipped with a non-resettable running time meter.

B. Attachment H or an equivalent form shall be used to record the hours of operation. These records shall include the operating hours for that month and the total hours of operation for the previous twelve month period.

C. The permittee shall report to the Air Pollution Control Program's (APCP) Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the end of the month during which the records from Special Condition 26.B. indicate that the source exceeds the Special Condition 26.A.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION 001
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart IIII
National Emission Standards for Hazardous Air Pollutants: Surface Coating for Automobiles and Light-Duty Trucks

Passenger Paint Line EU0010 through EU0105		
Emission Unit	Description	2013 EIQ Reference #
EU0010	Passenger Body Shop –Passenger Body Shop Sealer	EP-49
EU0020	Passenger Electrocoat (E-Coat) – Passenger E-Coat Tank, Passenger E-Coat Oven	EP-02 & EP-03
EU0030	Passenger Sealer – Passenger Sealer Deck, Passenger Sealer Oven	EP-04
EU0040	Passenger PVC Enclosure – Passenger PVC Booth, Passenger PVC Oven	EP-05 & EP-06
EU0050	Passenger Guidecoat – Passenger Guidecoat Booth, Passenger Guidecoat oven, Passenger Guidecoat Purge and Clean	EP-07, EP-08, EP-39 & EP-54
EU0060	Passenger Topcoat – Passenger Topcoat Booth 1, Passenger Topcoat Booth 2, Passenger Topcoat Oven 1, Passenger Topcoat Oven 2, Passenger Topcoat Purge and Clean, Passenger Spot Repair	EP-09, EP-10, EP-11, EP-12, EO-39, EP-54 & EP-24
EU0070	Passenger Wax	EP-13
EU0080	Passenger Blackout Booth	EP-31
EU0090	Passenger Final Repair – Passenger Final Repair Booth, Passenger Final Repair Oven	EP-26 & EP-27
EU0100	Passenger Glass Install – Passenger Windshield Glass Install, Passenger Quarterglass Install	EP-55 & EP-48
EU0105	Passenger Ditch Molding	EP-47

Commercial Paint Line EU0120 through EU0190		
Emission Unit	Description	2012 EIQ Reference #
EU0120	Commercial Body Shop –Commercial Body Shop Sealer	EP-56
EU0130	Commercial Electrocoat (E-Coat) – Commercial E-Coat Tank, Commercial E-Coat Oven	EP15 & EP16
EU0140	Commercial Sealer – Commercial Sealer Deck, Commercial Sealer Oven	EP-17
EU0150	Commercial Guidecoat – Commercial Guidecoat Booth, Commercial Guidecoat Oven, Commercial Guidecoat Purge and Clean	EP-18, EP-19, EP-39 & EP-57

EU0160	Commercial Topcoat – Commercial Topcoat Booth, Commercial Tutone Booth, Commercial Topcoat Oven, Commercial Tutone Oven, Commercial Spot Repair, Commercial Topcoat Purge and Clean	EP-20, EP-21, EP-22, EP-23, EP24, EP-39 & EP57
EU0170	Commercial Blackout Booth	EP-25
EU0180	Commercial Final Repair – Commercial Final Repair Booth, Commercial Final Repair Oven	EP-26 & EP-27
EU0190	Commercial Glass Install – Commercial Windshield Glass Install	EP-58

Paint Line Solvent Storage/Cleaning and Miscellaneous Processes EU0300 and EU0320 through EU0380		
Emission Unit	Description	2013 EIQ Reference #
EU0300	Miscellaneous Solvent Use	EP-42
EU0320	Passenger Scrap Paint Tank	EP-38
EU0330	Passenger Spent Solvent Tank	EP-38
EU0340	Passenger Paint Mix Room	EP-46
EU0350	Commercial Scrap Paint Tank	EP-38
EU0360	Commercial Spent Solvent Tank	EP-38
EU0370	Commercial Paint Mix Room	EP-46
EU0380	Paint Stripper	EP-29

Emission Limitations:

1) Except as provided in §63.3091(b) [Condition 3.], the permittee must limit combined organic HAP emissions to the atmosphere from electrodeposition primer (e-coat), primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c) to no more than **0.072 kg/liter (0.60 lb/gal)** for existing sources (Commercial and Passenger Paint Lines) and **0.036 kg/liter (0.30 lb/gal)** for new sources of coating solids deposited during each month, determined according to the requirements in §63.3161. [40 CFR 63.3091(a)]
2) If the permittee meets the operating limits of either §63.3092(a) or (b), the facility may choose to comply with the emission limits of §63.3091(b) [Condition 3.] instead of the emission limits of §63.3091(a) [Condition 1] .
   a) Each individual material added to the electrodeposition primer (e-coat) system contains no more than: [40 CFR 63.3092(a)]
      i) 1.0 percent by weight of any organic HAP; and
      ii) 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4).
   b) Emissions from all bake ovens used to cure electrodeposition primers (e-coat) must be captured and ducted to a control device having a destruction or removal efficiency of at least ninety-five percent. [40 CFR 63.3092(b)]
3) If the permittee meets the operating limits of either §63.3092(a) or (b) [Condition 2.], the permittee must either meet the emission limits of §63.3091(a) [Condition 1.] or limit combined organic HAP emissions to the atmosphere from primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener

materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c) to no more than **0.132 kg/liter (1.10 lb/gal)** for existing sources (Commercial and Passenger Paint Lines) and **0.06 kg/liter (0.50 lb/gal)** for new sources of coating solids deposited during each month, determined according to the requirements in §63.3171. [40 CFR 63.3091(b)]

4) The permittee must limit average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems to no more than **0.010 kg/kg (lb/lb)** of adhesive and sealer material used during each month. [40 CFR 63.3091(c)]
5) The permittee must limit average organic HAP emissions from all deadener materials to no more than **0.010 kg/kg (lb/lb)** of deadener material used during each month. [40 CFR 63.3091(d)]
6) If the facility has multiple paint lines, then for the operations addressed in Conditions 1 through 5 above: [40 CFR 63.3091(f)]
   a) The permittee may choose to use a single grouping under §63.3091(a) (Condition 1) for all of the electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations.
   b) The permittee may choose to use a single grouping under §63.3091(b) (Condition 3) for all of the primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations, as long as each of the electrodeposition primer systems meets the operating limits of §63.3092(a) or (b).
   c) The permittee may choose to use one or more groupings under §63.3091(a) (Condition 1) for the electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations from one or more of your paint lines; and one or more groupings under §63.3091(b) (Condition 3) for the primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations from the remainder of the paint lines, as long as each electrodeposition primer system associated with each paint line you included in a grouping under §63.3091(b) (Condition 3) meets the operating limits of §63.3092(a) or (b).
   d) The permittee may choose to consider the electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations from each of the paint lines as a separate grouping under either §63.3091(a) or (b). The electrodeposition primer system associated with each paint line you choose to consider in a grouping under §63.3091(b) (Condition 3) must meet the operating limits of §63.3092(a) or (b).

Operating Limits and Standards:

1) The permittee is not required to meet any operating limits for any coating operation(s) without add-on controls. [40 CFR 63.3093(a)] (*NOTE: Add-on controls are any controls on the coating operation that are essential to meeting the emission limitations of this rule.*)
2) For any controlled coating operation(s), the permittee must meet the operating limits specified in Table 1 to 40 CFR Part 63 Subpart IIII (see Attachment I). These operating limits apply to the emission capture and add-on control systems on the coating operation(s) for which the facility uses this option, and the permittee must establish the operating limits during the performance test according to the requirements in §63.3167. The permittee must meet the operating limits at all times after they are established. [40 CFR 63.3093(b)]
3) If the permittee chooses to meet the emission limitations of §63.3092(b) and the emission limits of §63.3091(b), then the permittee must operate the capture system and add-on control device used to capture and control emissions from your electrodeposition primer (e-coat) bake oven(s) so that they meet the operating limits specified in Table 1 to 40 CFR Part 63 Subpart IIII (see Attachment I). [40 CFR 63.3093(c)]

4) The coating operations must be in compliance with the operating limits for emission capture systems and add-on control devices required by §63.3093 at all times except during periods of startup, shutdown, and malfunction. [40 CFR 63.3100(b)]
5) The permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with this rule, according to the provisions in §63.6(e)(1)(i). [40 CFR 63.3100(d)]
6) If the affected source uses emission capture systems and add-on control devices, the permittee must develop a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in §63.6(e)(3). The SSMP must address startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control devices. [40 CFR 63.3100(f)]

Work Practice Plan Requirements:

1) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under §63.3091(a) through (d). The plan must specify practices and procedures to ensure that, at a minimum, the following (elements specified in paragraphs §63.3094(b)(1) through (5)) are implemented: [40 CFR 63.3094(b)]
   a) All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers. [40 CFR 63.3094(b)(1)]
   b) The risk of spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be minimized. [40 CFR 63.3094(b)(2)]
   c) Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes. [40 CFR 63.3094(b)(3)]
   d) Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents. [40 CFR 63.3094(b)(4)]
   e) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment. [40 CFR 63.3094(b)(5)]
2) The permittee must develop and implement a work practice plan to minimize organic HAP emissions from cleaning and from purging of equipment associated with all coating operations for which emission limits are established under §63.3091(a) through (d). The plan shall, at a minimum, address each of the following operations (listed in §63.3094(c)(1) (i) through (viii)), in which the permittee uses organic-HAP-containing materials or in which there is a potential for emission of organic HAP: [40 CFR 63.3094(c)]
   a) Vehicle body wipes,
   b) Coating line purging,
   c) Flushing of coating systems,
   d) Cleaning of spray booth grates,
   e) Cleaning of spray booth walls,
   f) Cleaning of spray booth equipment,
   g) Cleaning of external spray booth areas,
   h) And any other necessary housekeeping measures associated with this paint line that are not addressed above.
3) The work practice plans developed in accordance with §63.3094(b) and (c) are not required to be incorporated into this operating permit. Any revisions to the work practice plans developed in

accordance with §63.3094 (b) and (c) do not constitute revisions to this operating permit. [40 CFR 63.3094(e)]

4) Copies of the current work practice plans developed in accordance with §63.3094(b) and (c), as well as plans developed within the preceding five years must be available on-site for inspection and copying by the permitting authority. [40 CFR 63.3094(f)]
5) The permittee must be in compliance with the work practice standards in §63.3094 at all times. [40 CFR 63.3100(c)]

Continuous Compliance Requirements:

1) To demonstrate continuous compliance with the applicable emission limit in §63.3091(a), the organic HAP emission rate for each compliance period, determined according to the procedures in §63.3161, must be equal to or less than the applicable emission limit in §63.3091(a). A compliance period consists of one month. Each month after the end of the initial compliance period described in §63.3160 is a compliance period consisting of that month. The permittee must perform the calculations in §63.3161 on a monthly basis. [40 CFR 63.3163(a)]
2) To demonstrate continuous compliance with the applicable emission limit in §63.3091(b), the organic HAP emission rate for each compliance period determined according to the procedures in §63.3171 must be equal to or less than the applicable emission limit in §63.3091(b). A compliance period consists of one month. Each month after the end of the initial compliance period described in §63.3170 is a compliance period consisting of that month. The permittee must perform the calculations in §63.3171 on a monthly basis. [40 CFR 63.3173(a)]
3) To demonstrate continuous compliance with the emission limits for adhesives sealers and deadeners, the mass average organic HAP content for each compliance period, determined according to §63.3151 (a) through (d), must be less than or equal to the applicable emission limit in §63.3090(c) and (d) or §63.3091 (c) and (d). A compliance period consists of one month. Each month after the end of the initial compliance period described in §63.3150 is a compliance period consisting of that month. [40 CFR 63.3152(a)]
4) If the organic HAP emission rate for any one month compliance period exceeds the applicable emission limit in §63.3091(a) or §63.3091(b), this is a deviation from the emission limitation for that compliance period and must be reported as specified in §63.3110(c)(6) and 63.3120(a)(6). [40 CFR 63.3163(b) and 40 CFR 63.3173(b)]
5) If the mass average organic HAP emission content for any compliance period exceeds the applicable emission limit in §63.3091(c) and (d), this is a deviation from the emission limitations for that compliance period and must be reported as specified in §63.3110(c)(6) and 63.3120(a)(5). [40 CFR 63.3152(a)]
6) The permittee must demonstrate continuous compliance with each operating limit required by §63.3093 that applies to the facility, as specified in Table 1 of this rule (see Attachment I). [40 CFR 63.3163(c)]
    a) If an operating parameter is out of the allowed range specified in Table 1 of this rule (see Attachment I), this is a deviation from the operating limit that must be reported as specified in §63.3110(c)(6) and 63.3120(a)(6).
    b) If an operating parameter deviates from the operating limit specified Table 1 of this rule (see Attachment I), then you must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation except as provided in §63.3161(p).
7) The permittee must meet the requirements for bypass lines in §63.3168(b) for control devices other than solvent recovery systems for which you conduct liquid-liquid material balances. If any bypass

line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in §63.3110(c)(6) and 63.3120(a)(6). For the purposes of completing the compliance calculations specified in §63.3161(k), the permittee must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation. [40 CFR 63.3163(d)]

8) The permittee must demonstrate continuous compliance with the work practice standards in §63.3094. If the permittee did not develop a work practice plan, if the permittee did not implement the plan, or if permittee did not keep the records required by §63.3130(n), this is a deviation from the work practice standards that must be reported as specified in §63.3110(c)(6) and 63.3120(a)(6). [40 CFR 63.3163(e)]
9) If there were no deviations from the emission limitations, submit a statement as part of the semi-annual compliance report that you were in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3091(a), and the permittee achieved the operating limits required by §63.3093 and the work practice standards required by §63.3094 during each compliance period. [40 CFR 63.3163(f)]
10) Consistent with §63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction of the emission capture system, add-on control device, or coating operation that may affect emission capture or control device efficiency are not violations if the permittee demonstrates to the Air Pollution Control Program's satisfaction that you were operating in accordance with §63.6(e)(1). The Air Pollution Control Program will determine whether deviations that occur during a period that is identified as a startup, shutdown, or malfunction are violations according to the provisions in §63.6(e). [40 CFR 63.3163(h)]
11) The permittee must maintain records as specified in §63.3130 and 63.3131. [40 CFR 63.3163(j)]

Recordkeeping:

The permittee must collect and keep the following records of the data and information collected in accordance with the applicable standard:

1) A copy of each notification and report that you submitted to comply with Subpart IIII, and the documentation supporting each notification and report. [40 CFR 63.3130(a)]
2) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP, the density and the volume fraction of coating solids for each coating, the mass fraction of organic HAP and the density for each thinner, and the mass fraction of organic HAP for each cleaning material. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. If the permittee uses the results of an analysis conducted by an outside testing lab, the permittee must keep a copy of the test report. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3130(b)]
3) For each month, the following records must be kept: [40 CFR 63.3130(c)]
    a) For each coating used for electrodeposition primer (e-coat), primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer, and glass bonding adhesive operations and for each coating, except for deadener and for adhesive and sealer that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c), a

record of the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids.

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

c) For each deadener material and for each adhesive and sealer material, a record of the mass used in each month and the mass organic HAP content.

d) A record of the calculation of the organic HAP emission rate for electrodeposition primer (e-coat), primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer, and glass bonding adhesive plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c) for each month if subject to the emission limit of §63.3091(a). This record must include all raw data, algorithms, and intermediate calculations. If the guidelines presented in the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA–450/3–88–018 (Docket ID No. OAR–2002–0093 and Docket ID No. A–2001–22), are used, the permittee must keep records of all data input to this protocol. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. These data must be provided to the permitting authority on request on paper, and in (if calculations are done electronically) electronic form.

e) A record of the calculation of the organic HAP emission rate for primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer, and glass bonding adhesive plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c) for each month if subject to the emission limit of §63.3091(b), and a record of the weight fraction of each organic HAP in each material added to the electrodeposition primer (e-coat) system if subject to the limitations of §63.3092(a). This record must include all raw data, algorithms, and intermediate calculations. If the guidelines presented in the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA–450/3–88–018 (Docket ID No. OAR–2002–0093 and Docket ID No. A–2001–22), are used, the permittee must keep records of all data input to this protocol. If these data are maintained as electronic files, the electronic files, as well as any paper copies, must be maintained. These data must be provided to the permitting authority on request on paper, and in (if calculations are done electronically) electronic form.

f) A record, for each month, of the calculation of the average monthly mass organic HAP content of:
   i) Sealers and adhesives; and
   ii) Deadeners.

4) A record of the name and volume of each cleaning material used during each month. [40 CFR 63.3130(d)]

5) A record of the mass fraction of organic HAP for each cleaning material used during each month. [40 CFR 63.3130(e)]

6) A record of the density for each cleaning material used during each month. [40 CFR 63.3130(f)]

7) A record of the date, time, and duration of each deviation, and for each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction. [40 CFR 63.3130(g)]
8) The records required by §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [40 CFR 63.3130(h)]
9) For each capture system that is a PTE, the data and documentation used to support a determination that the capture system meets the criteria in Method 204 of Appendix M to 40 CFR Part 51 for a PTE and has a capture efficiency of one hundred percent, as specified in §63.3165(a). [40 CFR 63.3130(i)]
10) For each capture system that is not a PTE, the data and documentation used to determine capture efficiency according to the requirements specified in §63.3164 and 63.3165 (b) through (g), including any of the following records that apply: [40 CFR 63.3130(j)]
    a) Records for a liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure. Records of the mass of total volatile hydrocarbon (TVH), as measured by Method 204A or F of Appendix M to 40 CFR Part 51, for each material used in the coating operation, and the total TVH for all materials used during each capture efficiency test run, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or E of Appendix M to 40 CFR Part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure.
    b) Records for a gas-to-gas protocol using a temporary total enclosure or a building enclosure. Records of the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or C of Appendix M to 40 CFR Part 51, at the inlet to the add-on control device, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or E of Appendix M to 40 CFR Part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure.
    c) Records for panel tests. Records needed to document a capture efficiency determination using a panel test as described in §63.3165 (e) and (g), including a copy of the test report and calculations performed to convert the panel test results to percent capture efficiency values.
    d) Records for an alternative protocol. Records needed to document a capture efficiency determination using an alternative method or protocol, as specified in §63.3165(f), if applicable.
11) The following records for each add-on control device organic HAP destruction or removal efficiency determination as specified in §63.3166: [40 CFR 63.3130(k)]
    a) Records of each add-on control device performance test conducted according to §63.3164 and 63.3166.
    b) Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.
12) Records of the data and calculations you used to establish the emission capture and add-on control device operating limits as specified in §63.3167 and to document compliance with the operating limits as specified in Table 1 of this rule (see Attachment H) . [40 CFR 63.3130(l)]
13) Records of the data and calculations used to determine the transfer efficiency for primer-surfacer and topcoat coatings and for all coatings, except for deadener and for adhesive and sealer that are not

components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082 (c). [40 CFR 63.3130(m)]

14) A record of the work practice plans required by §63.3094 (b) and (c) and documentation that the permittee is implementing the plans on a continuous basis. Appropriate documentation may include operational and maintenance records, records of documented inspections, and records of internal audits. [40 CFR 63.3130(n)]
15) For each add-on control device and for each continuous parameter monitoring system, a copy of the equipment operating instructions must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors. The permittee may prepare the equipment operating instructions, or they may be provided by the equipment supplier or other third party. [40 CFR 63.3130(o)]
16) All required records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.3131(a)]
17) Except as provided in §63.3130(o), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record, as specified in §63.10(b)(1). [40 CFR 63.3131(b)]
18) Except as provided in §63.3130(o), the permittee must keep each record on site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off site for the remaining three years. [40 CFR 63.3131(c)]

Reporting:

1) The permittee shall report any deviations of these permit conditions to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) [40 CFR 70.6(a)(3)(iii)(A)].
2) The permittee must report all deviations as defined in 40 CFR Part 63 Subpart IIII in the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If the permittee submits a semi-annual compliance report along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semi-annual compliance report includes all required information concerning deviations from any emission limit, operating limit, or work practice in Subpart IIII, its submission shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a semi-annual compliance report shall not otherwise affect any obligation you may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.3120(a)(2)]
3) In addition to the requirements of 10 CSR 10-6.065(6)(C)1.C.(III), the semi-annual reports must contain the following information: [40 CFR 63.3120(a)(3)]
   a) Company name and address.
   b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
   c) Date of report and beginning and ending dates of the reporting period.
   d) Identification of the compliance option specified in §63.3091(b) that was used for electrodeposition primer (e-coat), primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass

bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c) in the affected source during the initial compliance period.

e) If there were no deviations from the emission limitations, operating limits, or work practices in §63.3090, §63.3091, §63.3092, §63.3093, and §63.3094 that apply to the facility, the semi-annual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If the permittee used control devices to comply with the emission limits, and there were no periods during which the CPMS were out of control as specified in §63.8(c)(7), the semi-annual compliance report must include a statement that there were no periods during which the CPMS were out of control during the reporting period. [40 CFR 63.3120(a)(4)]

f) If there was a deviation from the applicable emission limits in §63.3091(c) and (d), for adhesives, sealers or deadeners, the semi-annual compliance report must contain the following information: [40 CFR 63.3120(a)(5)]
   i) The beginning and ending dates of each month during which the monthly average organic HAP content exceeded the applicable emission limit in §63.3091(c) and (d).
   ii) The volume and organic HAP content of each material used that is subject to the applicable organic HAP content limit.
   iii) The calculation used to determine the average monthly organic HAP content for the month in which the deviation occurred.
   iv) The reason for the deviation.

g) If there was a deviation from the applicable emission limits in §63.3091(a) or (b), for combined electrodeposition primer (e-coat), primer-surfacer (guidecoat), topcoat, final repair, glass bonding primer and glass bonding adhesive, or combined primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c), the semi-annual compliance report must contain the following information: [40 CFR 63.3120(a)(6)]
   i) The beginning and ending dates of each month during which the monthly organic HAP emission rate exceeded the applicable emission limit in §63.3091(a) or (b).
   ii) The calculation used to determine the monthly organic HAP emission rate in accordance with §63.3161 or §63.3171. The permittee does not need to submit the background data supporting these calculations, for example, information provided by materials suppliers or manufacturers, or test reports.
   iii) The date and time that any malfunctions of the capture system or add-on control devices used to control emissions from these operations started and stopped.
   iv) A brief description of the CPMS.
   v) The date of the latest CPMS certification or audit.
   vi) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.
   vii) The date and time period that each CPMS was out of control, including the information in §63.8(c)(8).
   viii) The date and time period of each deviation from an operating limit in Table 1 of this rule (see Attachment I); date and time period of each bypass of an add-on control device; and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

ix) A summary of the total duration and the percent of the total source operating time of the deviations from each operating limit in Table 1 of this rule (see Attachment I) and the bypass of each add-on control device during the semi-annual reporting period.
x) A breakdown of the total duration of the deviations from each operating limit in Table 1 of this rule (see Attachment I) and bypasses of each add-on control device during the semi-annual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
xi) A summary of the total duration and the percent of the total source operating time of the downtime for each CPMS during the semi-annual reporting period.
xii) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control devices since the last semi-annual reporting period.
xiii) For each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the actions you took to correct the deviation.
xiv) A statement of the cause of each deviation.

h) If the permittee used the separate electrodeposition primer (e-coat) organic HAP content limits in §63.3092(a), and there was a deviation from these limits, the semi-annual compliance report must contain the following information: [40 CFR 63.3120(a)(7)]
i) Identification of each material used that deviated from the emission limit, and the dates and time periods each was used.
ii) The determination of mass fraction of each organic HAP for each material identified in paragraph (a)(7)(i) of this §63.3120(a)(7). You do not need to submit background data supporting this calculation, for example, information provided by material suppliers or manufacturers, or test reports.
iii) A statement of the cause of each deviation.

i) If the permittee used the separate electrodeposition primer (e-coat) bake oven capture and control limitations in §63.3092(b), and there was a deviation from these limitations, the semi-annual compliance report must contain the following information: [40 CFR 63.3120(a)(8)]
i) The beginning and ending dates of each month during which there was a deviation from the separate electrodeposition primer (e-coat) bake oven capture and control limitations in §63.3092(b).
ii) The date and time that any malfunctions of the capture systems or control devices used to control emissions from the electrodeposition primer (e-coat) bake oven started and stopped.
iii) A brief description of the CPMS.
iv) The date of the latest CPMS certification or audit.
v) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.
vi) The date, time, and duration that each CPMS was out of control, including the information in §63.8(c)(8).
vii) The date and time period of each deviation from an operating limit in Table 1 of this rule (see Attachment I); date and time period of each bypass of an add-on control device; and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
viii) A summary of the total duration and the percent of the total source operating time of the deviations from each operating limit in Table 1 of this rule (see Attachment I) and the bypasses of each add-on control device during the semi-annual reporting period.
ix) A breakdown of the total duration of the deviations from each operating limit, Table 1 of this rule (see Attachment I), and bypasses of each add-on control device during the

semi-annual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

x) A summary of the total duration and the percent of the total source operating time of the downtime for each CPMS during the semi-annual reporting period.

xi) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control devices since the last semi-annual reporting period.

xii) A statement of the cause of each deviation.

j) If there was a deviation from an applicable work practice plan developed in accordance with §63.3094(b) or (c), the semi-annual compliance report must contain the following information: [40 CFR 63.3120(a)(9)]

i) The time period during which each deviation occurred.

ii) The nature of each deviation.

iii) The corrective action(s) taken to bring the applicable work practices into compliance with the work practice plan.

4) If the permittee uses add-on control devices, the permittee must submit reports of performance test results for emission capture systems and add-on control devices no later than sixty days after completing the tests as specified in §63.10(d)(2). The permittee must submit reports of transfer efficiency tests no later than sixty days after completing the tests as specified in §63.10(d)(2). [40 CFR 63.3120(b)]

5) If the permittee used add-on control devices had a startup, shutdown, or malfunction during the semi-annual reporting period, the permittee must submit the following reports: [40 CFR 63.3120(c)]

a) If the actions taken were consistent with the SSMP, the permittee must include the information specified in §63.10(d) in the semi-annual compliance report required by §63.3120(a).

b) If the actions were not consistent with the SSMP, the permittee must submit an immediate startup, shutdown, and malfunction report as described below:

i) The permittee must describe the actions taken during the event in a report delivered by facsimile, telephone, or other means to the Air Pollution Control Program within two working days after starting actions that are inconsistent with the plan.

ii) The permittee must submit a letter to the Air Pollution Control Program within seven working days after the end of the event, unless the permittee has made alternative arrangements, as specified in §63.10(d)(5)(ii). The letter must contain the information specified in §63.10(d)(5)(ii).

PERMIT CONDITION 002

10 CSR 10-2.230
Control of Emissions From Industrial Surface Coating

Passenger Paint Line EU0020 through EU0090		
Emission Unit	Description	2013 EIQ Reference #
EU0020	Passenger Electrocoat (E-Coat) – Passenger E-Coat Tank, Passenger E-Coat Oven	EP-02 & EP-03
EU0030	Passenger Sealer – Passenger Sealer Deck, Passenger Sealer Oven	EP-04
EU0040	Passenger PVC Enclosure – Passenger PVC Booth, Passenger PVC Oven	EP-05 & EP-06
EU0050	Passenger Guidecoat – Passenger Guidecoat Booth, Passenger Guidecoat oven, Passenger Guidecoat Purge and Clean	EP-07, EP-08, EP-39 & EP-54
EU0060	Passenger Topcoat – Passenger Topcoat Booth 1, Passenger Topcoat Booth 2, Passenger Topcoat Oven 1, Passenger Topcoat Oven 2, Passenger Topcoat Purge and Clean, Passenger Spot Repair	EP-09, EP-10, EP-11, EP-12, EO-39, EP-54 & EP-24
EU0070	Passenger Wax	EP-13
EU0080	Passenger Blackout Booth	EP-31
EU0090	Passenger Final Repair – Passenger Final Repair Booth, Passenger Final Repair Oven	EP-26 & EP-27

Commercial Paint Line EU0130 through EU0180		
Emission Unit	Description	2013 EIQ Reference #
EU0130	Commercial Electrocoat (E-Coat) – Commercial E-Coat Tank, Commercial E-Coat Oven	EP15 & EP16
EU0140	Commercial Sealer – Commercial Sealer Deck, Commercial Sealer Oven	EP-17
EU0150	Commercial Guidecoat – Commercial Guidecoat Booth, Commercial Guidecoat Oven, Commercial Guidecoat Purge and Clean	EP-18, EP-19, EP-39 & EP-57
EU0160	Commercial Topcoat – Commercial Topcoat Booth, Commercial Tutone Booth, Commercial Topcoat Oven, Commercial Tutone Oven, Commercial Spot Repair, Commercial Topcoat Purge and Clean	EP-20, EP-21, EP-22, EP-23, EP24, EP-39 & EP57
EU0170	Commercial Blackout Booth	EP-25
EU0180	Commercial Final Repair – Commercial Final Repair Booth, Commercial Final Repair Oven	EP-26 & EP-27

Emission Limitation:

The permittee shall not emit to the atmosphere any VOC from any surface coating operation in excess of the amount allowed in §6.230(4)(A) and (B), as given in Tables A or B below. These limits will apply across all application areas, flash-off areas and ovens used in an affected coating operation.

1) Table A: VOC Emission Limits Based on Solids Applied.

Surface Coating Operation	lbs VOC/gallons solids applied
Primer Surfacer	15.1
Topcoat (Passenger/SUV)	15.1
Topcoat (Truck/Commercial)	15.1

2) Table B: VOC Emission Limits Based on Weight of VOC per Gallon of Coating (minus water and non-VOC organic compounds).

Surface Coating Operation	lbs VOC/gallons coating (minus water)
Electrocoat Prime	1.2
Topcoat (Truck/Commercial)	3.6
Topcoat (Passenger/SUV)	3.6
Final Repair	4.8
Miscellaneous Metal Parts— Extreme Performance and Air-Dried Coatings	3.5

Monitoring:

Compliance with the limitations of this regulation shall be determined by the following methods, as applicable and appropriate.

1) For the emission limits in Table A, the calculation of daily volume-weighted emission performance for automobile and light-duty truck primer-surfacer and topcoat operations, shall be made according to procedures detailed in the Environmental Protection Agency (EPA) document entitled, *Protocol for Determining the Daily Volatile Organic Compound Emission Rate for Automobile and Light Duty Truck Topcoat Operations,* dated June 10, 1988.
2) For the emission limits in Table B,
   a) Compliance with emission limits may be demonstrated using the method referenced in 10 CSR 10-6.030(14)(C) using the one-hour bake. Emission performance shall be on the basis of a daily volume-weighted average of all coatings used in each surface coating operation as delivered to the coating applicator(s) on a coating line. The daily volume-weighted average ($DAVG_{vw}$) is calculated by the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^{n} A_i B_i}{C}$$

Where, A = daily gallons of each coating used (minus water and exempt solvents) in a surface coating operation.
B = pounds of VOC per gallon of coating (minus water and exempt solvents).
C = total daily gallons coating used (minus water and exempt solvents) in a surface coating operation.
n = number of all coatings used in a surface coating operation

   b) Compliance with the emission limits in Table B may also be demonstrated on pounds of VOC per gallon of coating solids basis. The demonstration is made by first converting the emission limit Table B to pounds of VOC per gallon of coating solids as shown in the following three (3) steps:

(1) $\frac{\text{lbs VOC / gal coating}}{7.36\,\text{lbs / gal}}\left[\frac{\text{from Table B}}{\text{average density of solvents}}\right]$ = volume fraction of VOC

(2) $1 - \text{volume fraction of VOC} = \text{volume fraction of solids}$

(3) $\frac{\text{lbs VOC / gal coating [from Table B]}}{\text{volume fraction of solids}} = \frac{\text{lbs VOC}}{\text{gal coating solids}}$

This value (from step (3)) is the new compliance figure. The VOC per gallon of coating solids for each coating used is then determined using the method referenced in 10 CSR 10-6.030(14)(C), using the one-hour bake. The composite daily volume-weighted average of pounds of VOC per gallon of coating solids as tested for in the actual coatings used is compared to the new compliance figure. Source operations on a coating line using coatings with a composite actual daily volume- weighted average value less than or equal to the new compliance figure are in compliance with this regulation.

3) As an alternative to the methods specified in §6.230(5)(A) and (B), compliance with the emission limits specified in §6.230(4)(A) and (B) may be demonstrated by the implementation of an emission reduction equivalency compliance plan which utilizes a daily weighted average of emissions from a single or combination of source operations provided that—
   a) All source operations involved in the plan are subject to the emission limits of this regulation;
   b) All source operations are part of the same installation;
   c) The total actual VOC emissions for each twenty-four hour period do not exceed the sum of the allowable emissions determined from Section (4) for each source operation for the same period;
   d) Equivalent emission reductions are accomplished in the time intervals allowed in §6.230(4)(B) as would be required for individual source operations;
   e) After December 24, 1987, testing of raw materials, emissions, equipment, or a combination of these, must be performed prior to initiation of an alternate compliance plan to verify any equivalent emission reductions claimed. All test methods and procedures to be acceptable for use in the equivalency determination must receive prior review and must have been approved by the director. Failure to gain test method and procedure approval of the director will invalidate the equivalency claim; and
   f) The overall plan is approved by the director.

Recordkeeping:

1) The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include:
   a) The type and the quantity of coatings used daily;
   b) The coating manufacturer's formulation data for each coating on forms provided or approved by the director;
   c) The type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
   d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
   e) The type and quantity of waste solvents reclaimed or discarded daily;
   f) The quantity of pieces or materials coated daily; and
   g) Any additional information pertinent to determine compliance.

2) Records, such as daily production rates, may be substituted for actual daily coating use measurement provided the permittee submits a demonstration approvable by the director that these records are adequate for the purposes of this regulation. This will apply for all surface coating industries until the EPA issues national daily emissions recordkeeping protocols for specific industrial classifications.
3) All records shall be maintained onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation. Any deviations from this permit condition shall be reported in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 003

10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60 Subpart MM
Standards for Performance for Automobile and Light Duty Truck and Surface Coating Operations

Passenger Paint Line
EU0020, EU0050 & EU0060

Emission Unit	Description	2013 EIQ Reference #
EU0020	Passenger Electrocoat (E-Coat) – Passenger E-Coat Tank, Passenger E-Coat Oven	EP-02 & EP-03
EU0050	Passenger Guidecoat – Passenger Guidecoat Booth, Passenger Guidecoat oven, Passenger Guidecoat Purge and Clean	EP-07, EP-08, EP-39 & EP-41
EU0060	Passenger Topcoat – Passenger Topcoat Booth 1, Passenger Topcoat Booth 2, Passenger Topcoat Oven 1, Passenger Topcoat Oven 2, Passenger Topcoat Purge and Clean, Passenger Spot Repair	EP-09, EP-10, EP-11, EP-12, EO-39, EP-41 & EP-24

Commercial Paint Line
EU0130 and EU0150 through EU0180

Emission Unit	Description	2013 EIQ Reference #
EU0130	Commercial Electrocoat (E-Coat) – Commercial E-Coat Tank, Commercial E-Coat Oven	EP15 & EP16
EU0150	Commercial Guidecoat – Commercial Guidecoat Booth, Commercial Guidecoat Oven, Commercial Guidecoat Purge and Clean	EP-18, EP-19, EP-39 & EP-41
EU0160	Commercial Topcoat – Commercial Topcoat Booth, Commercial Tutone Booth, Commercial Topcoat Oven, Commercial Tutone Oven, Commercial Spot Repair, Commercial Topcoat Purge and Clean	EP-20, EP-21, EP-22, EP-23, EP24, EP-39 & EP41

Emission Limitations:

The permittee shall not discharge or cause the discharge into the atmosphere VOC emissions in excess of: [40 CFR 60.392]

1) Prime Coat Operation.
   a) For each Electrodeposition (EDP) prime coat operation:
      i) 0.17 kilogram of VOC per liter (1.42 pounds of VOC per gallon) of applied coating solids when R_T (solids turnover ratio) is 0.16 or greater.
      ii) $0.17 \times 350^{(0.160 - R_T)}$ kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160.
      iii) When R_T is less than 0.040, there is no emission limit.
   b) For each non-electrodeposition prime coat operation: 0.17 kilogram of VOC per liter (1.42 pounds of VOC per gallon) of applied coating solids.
2) 1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids from each guide coat operation.
3) 1.47 kilograms of VOC per liter (12.3 pounds of VOC per gallon) of applied coating solids from each topcoat operation.

Monitoring:

The permittee shall use the following procedures for determining the monthly volume-weighted average mass of VOC emitted per volume of applied coating solids: [40 CFR 60.393(c)]

1) The permittee shall use the following procedures for each affected facility which does not use a capture system and a control device to comply with the applicable emission limit specified under §60.392.[40 CFR 60.393(c)(1)]
   a) Calculate the volume-weighted average mass of VOC per volume of applied coating solids for each calendar month for each affected facility. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by Method 24. The administrator may require the permittee, who uses formulation data supplied by the manufacturer of the coating, to determine data used in the calculation of the VOC content of coatings by Method 24 or an equivalent or alternative method. The permittee shall determine from company records on a monthly basis, the volume of coating consumed, as received, and the mass of solvent used for thinning purposes. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month will be determined by the following procedures. [40 CFR 0.393(c)(1)(i)]
      i) Calculate the mass of VOC used in each calendar month for each affected facility by the following equation where "n" is the total number of coatings used and "m" is the total number of VOC solvents used: [40 CFR 60.393(c)(1)(i)(A)]

$$M_o + M_d = \sum_{i=1}^{n} L_{ci} D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj}$$

Where, M_o = total mass of VOC in coatings as received (kilograms)
M_d = total mass of VOC in dilution solvent (kilograms)
L_{ci} = volume of each coating (i) consumed, as received (liters)
D_{ci} = density of each coating (i) as received (kilograms per liter)
W_{oi} = proportion of VOC by weight in each coating (i), as received

L_{dj} = volume of each type VOC dilution solvent (j) added to the coatings, as received (liters)
D_{dj} = density of each type VOC dilution solvent (j) added to the coatings, as received (kilograms per liter)

($\sum L_{dj}D_{dj}$ will be zero if no VOC solvent is added to the coatings, as received.)

ii) Calculate the total volume of coating solids used in each calendar month for each affected facility by the following equation where "n" is the total number of coatings used: [40 CFR 60.393(c)(1)(i)(B)]

$$L_s = \sum_{i=1}^{n} L_{ci} V_{si}$$

Where, L_s = volume of solids in coatings consumed (liters)
L_{ci} = volume of each coating (i) consumed, as received (liters)
V_{si} = proportion of solids by volume in each coating (i) as received

iii) Select the appropriate transfer efficiency (T) from the following tables for each surface coating operation: [40 CFR 60.393(c)(1)(i)(C)]

Application Method	Transfer Efficiency
Air Atomized Spray (waterborne coating)	0.39
Air Atomized Spray (solvent-borne coating)	0.50
Manual Electrostatic Spray	0.75
Automatic Electrostatic Spray	0.95
Electrodeposition	1.00

The values in the table above represent an overall system efficiency which includes a total capture of purge. If a spray system uses line purging after each vehicle and does not collect any of the purge material, the following table shall be used:

Application Method	Transfer Efficiency
Air Atomized Spray (waterborne coating)	0.30
Air Atomized Spray (solvent-borne coating)	0.40
Manual Electrostatic Spray	0.62
Automatic Electrostatic Spray	0.75

If the permittee can justify to the administrator's satisfaction that other values for transfer efficiencies are appropriate, the administrator will approve their use on a case-by-case basis.
When more than one application method (l) is used on an individual surface coating operation, the permittee shall perform an analysis to determine an average transfer efficiency by the following equation where "n" is the total number of coatings used and "p" is the total number of application methods:

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

Where, T_l = transfer efficiency for application method (l)
L_{cil} = Volume of each coating (i) consumed by each application method (l), as received (liters)

iv) Calculate the volume-weighted average mass of VOC per volume of applied coating solids (G) during each calendar month for each affected facility by the following equation: [40 CFR 60.393(c)(1)(i)(D)]

$$G = \frac{M_o + M_d}{L_s T}$$

Where, T = overall transfer efficiency

v) For each EDP prime coat operation, calculate the turnover ratio (R_T) by the following equation: [40 CFR 60.393(c)(1)(i)(E)]

$$R_T = \frac{L_s}{L_E}$$, truncated after three decimal places

Where, L_E = the total volume of the EDP system (liters)
Then calculate or select the appropriate limit according to §60.392(a).

b) If the volume-weighted average mass of VOC per volume of applied coating solids (G), calculated on a calendar month basis, is less than or equal to the applicable emission limit specified in §60.392, the affected facility is in compliance. Each monthly calculation is a performance test for the purpose of Subpart MM. [40 CFR 60.393(c)(1)(ii)]

2) The permittee shall use the following procedures for each affected facility which uses a capture system and a control device that destroys VOC (e.g., incinerator) to comply with the applicable emission limit specified under §60.392. [40 CFR 60.393(c)(2)]

a) Calculate the volume-weighted average mass of VOC per volume of applied coating solids (G) during each calendar month for each affected facility as described under §60.393(c)(1)(i). [40 CFR 60.393(c)(2)(i)]

b) Calculate the volume-weighted average mass of VOC per volume of applied solids emitted after the control device, by the following equation: [40 CFR 60.393(c)(2)(ii)]

$$N = G \times [1 - (F \times E)]$$

Where, N = volume-weighted average mass of VOC per volume of applied coating solids after the
control device
F = fraction of total VOC which is emitted by an affected facility that enters the control device

E = VOC destruction or removal efficiency of the control device

i) Determine the fraction of total VOC which is emitted by an affected facility that enters the control device. In subsequent months, the permittee shall use the most recently determined capture fraction for the performance test. [40 CFR 60.393(c)(2)(ii)(A)]
ii) Determine the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation where "n" is the total number of stacks entering the control device and "m" is the total number of stacks leaving the control device: [40 CFR 60.393(c)(2)(ii)(B)]

$$E = \frac{\left[\sum_{i=1}^{n} Q_{bi} C_{bi}\right] - \left[\sum_{j=1}^{m} Q_{aj} C_{aj}\right]}{\sum_{i=1}^{n} Q_{bi} C_{bi}}$$

Where, Q_{bi} = volumetric flow rate of the effluent gas flowing through stack (i) entering the control device (dry standard cubic meters per hour)
C_{bi} = concentration of VOC (as carbon) in the effluent gas flowing through stack (i) entering the control device (parts per million by volume)
Q_{aj} = volumetric flow rate of the effluent gas flowing through stack (j) leaving the control device (dry standard cubic meters per hour)
C_{aj} = concentration of VOC (as carbon) in the effluent gas flowing through stack (j) leaving the control device (parts per million by volume)

In subsequent months, the permittee shall use the most recently determined VOC destruction efficiency for the performance test.

iii) If an emission control device controls the emissions from more than one affected facility, the permittee shall measure the VOC concentration (C_{bi}) in the effluent gas entering the control device (in parts per million by volume) and the volumetric flow rate (Q_{bi}) of the effluent gas (in dry standard cubic meters per hour) entering the device through each stack. The destruction or removal efficiency determined using these data shall be applied to each affected facility served by the control device. [40 CFR 60.393(c)(2)(ii)(C)]

c) If the volume-weighted average mass of VOC per volume of applied solids emitted after the control device (N) calculated on a calendar month basis is less than or equal to the applicable emission limit specified in §60.392, the affected facility is in compliance. Each monthly calculation is a performance test for the purposes of Subpart MM. [40 CFR 60.393(c)(2)(iii)]

3) The permittee shall use the following procedures for each affected facility which uses a capture system and a control device that recovers the VOC (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.392. [40 CFR 60.393(c)(3)]
a) Calculate the mass of VOC ($M_o + M_d$) used during each calendar month for each affected facility as described under §60.393(c)(1)(i). [40 CFR 60.393(c)(3)(i)]
b) Calculate the total volume of coating solids (L_s) used in each calendar month for each affected facility as described under §60.393(c)(1)(i). [40 CFR 60.393(c)(3)(ii)]
c) Calculate the mass of VOC recovered (M_r) each calendar month for each affected facility by the following equation: [40 CFR 60.393(c)(3)(iii)]

$$M_r = L_r D_r$$

Where, L_r = volume of VOC recovered from an affected facility (liters)
D_r = density of VOC recovered from an affected facility (kilograms per liter)

d) Calculate the volume-weighted average mass of VOC per volume of applied coating solids emitted after the control device during a calendar month by the following equation: [40 CFR 60.393(c)(3)(iv)]

$$N = \frac{M_o + M_d - M_r}{L_s T}$$

e) If the volume-weighted average mass of VOC per volume of applied solids emitted after the control device (N) calculated on a calendar month basis is less than or equal to the applicable emission limit specified in §60.392, the affected facility is in compliance. Each monthly calculation is a performance test for the purposes of Subpart MM. [40 CFR 60.393(c)(3)(v)]

4) The permittee of an affected facility which uses an incinerator to comply with the emission limits specified under §60.392 shall install, calibrate, maintain, and operate temperature measurement devices as prescribed below: [40 CFR 60.394]
   a) Where thermal incineration is used, a temperature measurement device shall be installed in the firebox. Where catalytic incineration is used, a temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed. [40 CFR 60.394(a)]
   b) Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ±5 percent of the temperature being measured expressed in degrees Celsius or ±2.5 °C. [40 CFR 60.394(b)]
   c) Each temperature measurement device shall be equipped with a recording device so that a permanent record is produced. [40 CFR 60.394(c)]

Recordkeeping/Reporting:

1) Following the initial performance test, the permittee of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.392. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semi-annually. Where compliance is achieved through the use of a capture system and control device, the volume-weighted average after the control device should be reported. [40 CFR 60.395(b)]
2) Where compliance with §60.392 is achieved through the use of incineration, the permittee shall continuously record the incinerator combustion temperature during coating operations for thermal incineration or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration. The permittee shall submit a written report at the frequency specified in §60.7(c) and as defined below. [40 CFR 60.395(c)]
   a) For thermal incinerators, every three-hour period shall be reported during which the average temperature measured is more than 28 °C less than the average temperature during the most

recent control device performance test at which the destruction efficiency was determined as specified under §60.393. [40 CFR 60.395(c)(1)]

b) For catalytic incinerators, every three-hour period shall be reported during which the average temperature immediately before the catalyst bed, when the coating system is operational, is more than 28 °C less than the average temperature immediately before the catalyst bed during the most recent control device performance test at which destruction efficiency was determined as specified under §60.393. In addition, every three-hour period shall be reported each quarter during which the average temperature difference across the catalyst bed when the coating system is operational is less than 80 percent of the average temperature difference of the device during the most recent control device performance test at which destruction efficiency was determined as specified under §60.393. [40 CFR 60.395(c)(2)]

c) For thermal and catalytic incinerators, if no such periods occur, the permitee shall submit a negative report. [40 CFR 60.395(c)(3)]

3) The permittee shall notify the administrator thirty days in advance of any test by Method 25. [40 CFR 60.395(d)]

4) All records shall be maintained onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

PERMIT CONDITION 004

40 CFR Part 64
Compliance Assurance Monitoring (CAM)

Passenger Paint Line EU0020, EU0050 & EU0060		
Emission Unit	Description	2013 EIQ Reference #
EU0020	Passenger Electrocoat (E-Coat) – Passenger E-Coat Tank, Passenger E-Coat Oven	EP-02 & EP-03
EU0060	Passenger Topcoat – Passenger Topcoat Booth 1, Passenger Topcoat Booth 2, Passenger Topcoat Oven 1, Passenger Topcoat Oven 2	EP-09 & EP-11

Commercial Paint Line EU0130 and EU0150 through EU0180		
Emission Unit	Description	2013 EIQ Reference #
EU0130	Commercial Electrocoat (E-Coat) – Commercial E-Coat Tank, Commercial E-Coat Oven	EP16
EU0150	Commercial Guidecoat – Commercial Guidecoat Booth, Commercial Guidecoat Oven	EP-18, EP-19
EU0160	Commercial Topcoat – Commercial Topcoat Booth, Commercial Tutone Booth, Commercial Topcoat Oven, Commercial Tutone Oven	EP-20, EP-22, EP-23

Monitoring:

The permittee is subject to the CAM plan contained in Table 1.

1) *CAM Compliance Indicators:* The following CAM Indicators shall be used to monitor the control device (VOC Oxidizer System) when a control efficiency is claimed for compliance with a pollutant emissions limitation:
   a) Combustion Chamber temperature;
   b) Concentrator desorption gas inlet temperature;
   c) Work practice/inspection: The permittee shall inspect internal and external structural integrity of each oxidizer to ensure proper operation.
   d) Performance Test: The permittee shall verify that the oxidizer meets the permitted destruction efficiency as specified in Permit Condition PW001 Conditions 13.B and 14.A.

Table 1: VOC Oxidizer System for Passenger and Commercial Paint Line
Ford Motor Co. – Kansas City Assembly Plant
Facility ID: 047-0019

	Indicator #1	**Indicator #2**	**Indicator #3**	**Indicator #4**
I. Indicator	Temperature in Combustion Chamber	Temperature of concentrator desorption gas inlet	Work practice/inspection	Performance test
Measurement approach	Temperature measurements of the thermal oxidizer shall be made at least once every 15 minutes and recorded during operation of the associated coating operations.	Temperature measurements of the concentrator desorption gas inlet shall be made at least once every 15 minutes and recorded during operation of the associated coating operations.	Inspect internal and external structural integrity of each oxidizer to ensure proper operation	Conduct emission test to demonstrate compliance with permitted destruction efficiency
II. Indicator Range	Whenever a connected process is in operation, an excursion is identified as a three-hour average temperature measurement of more than 50º F below the average combustion temperature during the most recent acceptable	Whenever a connected process is in operation, an excursion is identified as a three-hour average temperature measurement of more than 15º F below the average desorption gas	An excursion is identified as any finding that the structural integrity of an oxidizer has been jeopardized and it no longer operates as designed	An excursion is identified as any finding that an oxidizer does not meet the permitted destruction efficiency

	performance test and shall have a minimum design retention time of at least 0.5 seconds. temperature used to demonstrate compliance during the most recent VOC emission test	inlet temperature during the most recent acceptable performance test.		
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement		Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement
QIP Threshold	The QIP threshold for any individual emission unit is 9 excursions in a 6-month reporting period. If an emission unit reaches the QIP threshold, the permittee shall submit a QIP for that unit along with the Semi-annual Monitoring Report for that reporting period.			
III. Performance Criteria Data Representativeness	Any temperature monitoring device employed to measure temperature shall be accurate to within one percent of temperature measured or plus/minus one degrees F, whichever is greater		Inspections of the oxidizer system will identify problems	A test protocol shall be prepared and (if necessary) approved by the regulatory agency prior to conduction the performance test
Verification of Operation Status	Temperatures recorded on chart paper or electronic media		Inspection records	Not applicable
QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria plus or minus 20 degrees F		Not applicable	U.S. EPA test methods approved in agency's rules or in test protocol
Monitoring Frequency	Measured Continuously		External inspection monthly; internal inspection annually	As specified in special condition 10 of the PAL (Construction Permit 042008-001) and Permit Condition PW001 Condition 13.B and 14.A
Data Collection	Recorded at least every 15-minutes on a chart or electronic media		Recorded results of inspections and	Per approved test methods

Procedure		observations	
Averaging Period	Three hours if using 3-hour average as indicator	Not applicable	Not applicable
Recordkeeping	Maintain for a period of five years records of chart recorder paper or electronic media and corrective actions taken in response to excursions	Maintain for a period of five years records of inspections and corrective actions taken in response to excursions	Maintain a copy of the test report for each oxidizer for five years or until another test is conducted. Maintain records of corrective actions taken in response to excursions
Reporting	Number, duration, cause of any excursion and the corrective action taken		Submit test protocol and notification of testing to regulatory agency 30 days prior to test date. Submit test report 60 days after conducting a performance test
Frequency	Semi-annually		For each performance test conducted

2) *Proper Maintenance:* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [§64.7(b)]
3) *Continued operation:* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall collect data at all required intervals when the emission unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of Part 64. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§64.7(c)]
5) *Response to exceedances*: [§64.7(d)]
   a) Upon detecting an exceedance, the permittee shall restore operation of the emission unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an exceedance (other than those caused by excused start-up or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through

response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [§64.7(d)(1)]

b) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [§64.7(d)(2)]

Recordkeeping and Reporting:

1) The permittee shall keep records of maintenance inspections which include the dates of the inspections and the dates and reasons for repairs if made. The following items shall be addressed in an operation and maintenance (O&M) plan for each respective control device used to demonstrate compliance with applicable VOC emissions limits:
   Regenerative Thermal Oxidizers-
   a) Validation of operation of each thermocouple a minimum of once every 12 months or thermocouple replacement.
   b) Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months, or
   c) Perform an inspection of the valve seals condition once every 18 months and verify valve timing/synchronization through visual observation (or through an alarm system) once every 18 months.

   Concentrators-
   a) Validation of operation of each thermocouple a minimum of once every 12 months or thermocouple replacement.
   b) Perform semi-annual observations to confirm that the concentrator is rotating (if a rotary concentrator) and that the desorption fan is operating;
   c) Perform internal observation of adsorbent materials for contamination and erosion a minimum of once every 18 months;
   d) Observe and record the pressure drop across the concentrator a minimum of once every calendar quarter.
2) General Recordkeeping Requirements for CAM:
   a) The permittee shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii). The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [§64.9(b)(1)]
   b) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [§64.9(b)(2)]
3) All records shall be maintained for five years.
4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.
5) General Reporting Requirements for CAM: The permittee shall submit semi-annual monitoring certified by a responsible official using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III). The report shall include, at a minimum, the following information, as applicable: [§64.9(a)(1) & (2)]

a) All instances of deviations from permit requirements must be clearly identified;
b) Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken;
c) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [§64.9(a)(2)(i)]
d) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [§64.9(a)(2)(ii)]
e) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [§64.9(a)(2)(iii)].

6) Documentation of need for improved monitoring: If the permittee identifies a failure to achieve compliance with this permit condition for which the approved monitoring did not provide an indication of an exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Air Pollution Control Program and, if necessary, submit a proposed modification to the part 70 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [§64.7(e)]

PERMIT CONDITION 005

10 CSR 10-6.400
Restriction of Emission of Particulate Matter from Industrial Processes

Passenger Paint Line EU0050 through EU0090		
Emission Unit	Description	2013 EIQ Reference #
EU0050	Passenger Guidecoat – Passenger Guidecoat Booth, Passenger Guidecoat oven	EP-07, EP-08, EP-39
EU0060	Passenger Topcoat – Passenger Topcoat Booth 1, Passenger Topcoat Booth 2, Passenger Topcoat Oven 1, Passenger Topcoat Oven 2, Passenger Spot Repair	EP-09, EP-10, EP-11, EP-12, EO-39, & EP-24
EU0070	Passenger Wax	EP-13
EU0080	Passenger Blackout Booth	EP-31
EU0090	Passenger Final Repair – Passenger Final Repair Booth, Passenger Final Repair Oven	EP-26 & EP-27

Commercial Paint Line EU0150 through EU0180		
Emission Unit	Description	2013 EIQ Reference #
EU0150	Commercial Guidecoat – Commercial Guidecoat Booth, Commercial Guidecoat Oven	EP-18, EP-19, EP-39
EU0160	Commercial Topcoat – Commercial Topcoat Booth, Commercial Tutone Booth, Commercial Topcoat Oven, Commercial Tutone Oven, Commercial Spot Repair	EP-20, EP-21, EP-22, EP-23, EP24, EP-39
EU0170	Commercial Blackout Booth	EP-25
EU0180	Commercial Final Repair – Commercial Final Repair Booth, Commercial Final Repair Oven	EP-26 & EP-27

EU0270		
Emission Unit	Description	2013 EIQ Reference #
EU0270	Scuff Booths (5)	EP-40

Emission Limitations:

1) The permittee shall not emit particulate matter from these emission units in excess of:
   a) For process weight rates of 60,000 lb/hr or less:
      $E = 4.10(P)^{0.67}$
      Where:
      E = rate of emission in lb/hr
      P = process weight rate in tons/hr
   b) For process weight rates greater than 60,000 lb/hr:
      $E = 55.0(P)^{0.11} - 40$
      Where:
      E = rate of emission in lb/hr
      P = process weight rate in tons/hr
      Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.
2) The limitations established above shall not require the reduction of particulate matter concentration, based on the source gas volume, below the concentration specified in Table 1 of 10 CSR 10-6.400(3)(A)2.; provided that the permittee may elect to substitute a volume determined according the provisions listed below:
   a) Any volume of gases passing through and leaving an air pollution abatement operation may be substituted for the source gas volume of the source operation served by the air pollution abatement operation, provided that air pollution abatement operation emits no more than forty percent of the weight of particulate matter entering; and provided further that the substitute volume shall be corrected to standard conditions and to a moisture content of no greater than that of any gas stream entering the air pollution abatement operation.
3) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring:

1) If the installation chooses to demonstrate compliance by the process weight equation, the permittee shall monitor the process weight rate of the equipment
2) If the installation chooses to demonstrate compliance by the source gas volume options, the permittee shall demonstrate the source gas volume or other volume substituted, including all the factors which determine volume and the methods for determining the volume.
3) When emission controls are required to comply with particulate matter limitations:
   a) Booths equipped with control devices [water curtains, etc.] shall not be operated without controls in place and operating properly.
   b) The control devices shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the control device.
   c) The control devices shall be inspected each shift before spraying begins in a booth.
   d) The manufacturer's recommendations shall be followed with regard to installation and maintenance of the control devices.

Record Keeping:

1) The permittee shall maintain a log indicating whether or not the installation is complying with the emission limitations from the process weight equations or the source gas volume.
2) If the permittee is demonstrating compliance by the process weight equation, the permittee shall maintain a written or electronic record of the process weight rates of the equipment and the respective emission limitation and emission rates. Attachment J contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee must be used to certify compliance with this requirement.
3) If the installation chooses to demonstrate compliance by the source gas volume option, the permittee shall maintain records on the source gas volume or other volume substituted, including all the factors which determine volume and the methods for determining the volume and the respective emission limitation and emission rates.
4) Attachment J-2 contains a log demonstrating compliance with the emission limits using the source gas volume option. This log, or an equivalent created by the permittee must be used to certify compliance with this requirement.
5) When emission controls are required to comply with particulate matter limitations, the permittee shall maintain records of the inspections of control devices including when they occur (See Attachment F).
6) All records shall be maintained onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 006

10 CSR 10-2.210
Control of Emissions from Solvent Cleanup Operations

EU0250 – Solvent Degreasers		
Emission Unit	Description	2013 EIQ Reference #
EU0250	Solvent Degreasers	EP-35

Applicability:

1) This rule shall apply to all installations which emit volatile organic compounds (VOC) from solvent metal cleaning or degreasing operations.
2) This rule applies to any of the following processes that use non-aqueous solvents to clean and remove soils from metal parts:
   a) Spray gun cleaners;
   b) Cold cleaners with a solvent reservoir or tank;
   c) Open-top vapor or conveyorized degreasers; or
   d) Air-tight or airless cleaning systems.
   e) The following shall be exempt from this rule:
   f) Cold cleaners with liquid surface areas of one square foot or less or maximum capacities of one gallon or less;
   g) Solvent cleaning operations that meet the emission control requirements of 10 CSR 10-2.205, 10 CSR 10-2.230, 10 CSR 10-2.290 and 10 CSR 10-2.340;
   h) Solvent cleaning operations regulated under 40 CFR Part 63 Subpart T;
   i) The cleaning of electronic components, medical devices or optical devices;
   j) Hand cleaning/wiping operations; and
   k) Flush cleaning operations.
3) The following shall be exempt from the solvent vapor pressure requirements (Emission Limitation 1, below):
   a) Sales of cold cleaning solvents in quantities of five gallons or less;
   b) Cold cleaners using solvents regulated under any federal National Emission Standards for Hazardous Air Pollutants; and
   c) Janitorial and institutional cleaning.

Emission Limitation:

1) The permittee shall not operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 mm Hg at twenty degrees Celsius.
2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The director must approve the alternative method.

Operational Limitation/Equipment Specifications:

1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
2) When one or more of the following conditions exist, the design of the cover shall be such that it can be easily operated with one hand such that minimal disturbing of the solvent vapors in the tank

occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
   a) The solvent vapor pressure is greater than three-tenths (0.3) psi measure at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F)), such as in mineral spirits.
   b) The solvent is agitated; or
   c) The solvent is heated.
3) Each cold cleaner shall have a drainage facility which will be internal so that parts are enclosed under the cover while draining.
4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than six-tenths (0.6) psi measured at 37.8°C (100^{O}F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than six-tenths (0.6) psi measured at 37.8°C (100^{O}F) or is heated above 48.9°C (120^{O}F), must use one of the following control devices:
   a) A freeboard ratio of at least 0.75;
   b) Water cover (solvent must be insoluble in and heavier than water); or
   c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to sixty-five percent. These control systems must receive approval from the director prior to their use.
8) Each cold cleaner shall be operated as follows:
   a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir.
   b) Clean parts shall be drained in the freeboard area for at least fifteen seconds or until dripping ceases, whichever is longer.
   c) Whenever a cold cleaner fails to perform within the operating parameters established for it by this regulation, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established operating procedures.
   d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down and leaks secured until the leaks are repaired.
   e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods in accordance with the Missouri Hazardous Waste Management Commission Rules codified as 10 CSR 25, as applicable:
      i) Reduction of the waste material to less than twenty percent VOC solvent by distillation and proper disposal of the still bottom waste, or
      ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the director.
      iii) Waste solvent shall be stored in covered containers only.
9) Operators must be trained as follows:
   a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
   b) The supervisor of any person who operates a solvent metal cleaning process shall receive equivalent or greater operational training than the operators; and

c) Refresher training shall be given to all solvent metal cleaning equipment operators at least once every twelve-month period.

Monitoring:

The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.

Recordkeeping:

1) The permittee shall monitor the throughputs of the solvents monthly and maintain material safety data sheets of the cleanup solvents used at the installation.
2) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment K):
   a) Name and address of the solvent supplier.
   b) Date of purchase.
   c) Type of solvent purchased.
   d) Vapor pressure of solvent in mm Hg at 20^{O}C or 68^{O}F.
3) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumed. The records shall include all types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal installation and all amounts distilled on the premises (see Attachment L). The record also shall include maintenance and repair logs that occurred on the cold cleaner (Attachments F).
4) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment M).
5) All records shall be maintained onsite for a minimum of five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

Reports of any deviations from or exceedance of any of the terms imposed by this regulation, or any malfunction which causes a deviation from or exceedance of this regulation shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 007

10 CSR 10-2.330

Control of Gasoline Reid Vapor Pressure

EU0260 – Underground Storage Tanks		
Emission Unit	Description	2013 EIQ Reference #
EU0260	Three (3) 20,000 gallon Underground Gasoline Storage Tanks	EP-37

Emission Limitation:

1) This installation shall not sell, dispense, supply, offer for sale, offer for supply, transport or exchange in trade for use gasoline intended for final use in Clay, Platte and Jackson counties that exceeds the Reid Vapor Pressure (RVP) limit of seven and zero-tenths (7.0) psi during the time period from June 1 to September 15 of each year.

2) For gasoline blends having at least nine percent but not more than ten percent ethyl alcohol by volume of the blended mixture, the RVP shall not exceed eight and zero-tenths (8.0) psi during the time period from June 1 to September 15 of each year.
3) Gasoline that exceeds the RVP limits will not violate this rule if the gasoline is separately stored, sealed, clearly labeled and not used until it is in compliance with this rule. The label shall state that the gasoline is prohibited by Missouri law from being sold, dispensed, supplied, offered for sale, offered for supply, transported or exchanged in trade until the specific date that the gasoline shall be in compliance with this rule.

Monitoring:

1) When gasoline samples are taken, gasoline testing shall follow the procedures contained in "Tests for Determining Reid Vapor Pressure (RVP) of Gasoline and Gasoline-Oxygenate Blends," 40 CFR, Part 80, Appendix E.
2) Gasoline sampling shall follow the procedures outlined in "Sampling Procedures for Fuel Volatility," 40 CFR Part 80, Appendix D.
3) To determine compliance when field analysis indicates the RVP is between seven and zero-tenths (7.0) psi and seven and three tenths (7.3) psi for conventional gasoline or between eight and zero-tenths (8.0) psi and eight and three-tenths (8.3) psi for nine to ten percent ethyl alcohol blends, the Missouri Department of Natural Resources will conduct additional testing. Additional testing shall include independent analysis by three separate laboratories of three independent samples taken sequentially, in accordance with sections (4) and (5) of this rule. If all of the measured RVP of the samples are above seven and zero-tenths (7.0) psi for conventional gasoline or above eight and zero-tenths (8.0) psi for nine to ten percent ethyl alcohol blends, the department may take enforcement action.

Recordkeeping:

1) The permittee shall maintain records of any RVP testing and test results produced during the time period from June 1 to September 15 of each year. The installation shall be make these records available for review or duplication immediately upon request from Department of Natural Resources' personnel and city personnel certified under Section 643.140, RSMo.
2) Each bill of lading, invoice, loading ticket, delivery ticket and other document that accompanies a shipment of gasoline (which includes gasoline blended with ethyl alcohol) shall contain a legible and conspicuous statement that the RVP of the gasoline does not exceed seven and zero-tenths (7.0) psi, in accordance with this rule for conventional gasoline, or that the RVP does not exceed eight and zero-tenths (8.0) psi for nine to ten percent ethyl alcohol blends.
3) Each bill of lading, invoice, loading ticket, delivery ticket and other document that accompanies a shipment of gasoline containing ethyl alcohol shall contain a legible and conspicuous statement that the percentage concentration of ethyl alcohol is between nine percent and ten percent (9% - 10%).
4) This installation shall keep records of each bill of lading, invoice, loading ticket, delivery ticket and other document that accompanies a shipment of gasoline during the period from June 1 to September 15 of each year. The installation shall make these records available for review or duplication immediately upon request from Department of Natural Resources' personnel and city personnel certified under Section 643.140, RSMo.
5) All records shall be retained on site for a minimum a five years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 008

10 CSR 10-6.075
Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart EEEE
National Emission Standards for Hazardous Air Pollutants: Organic Liquids distribution (Non-Gasoline)

EU0290 – Windshield Washer Fluid UST		
Emission Unit	Description	2013 EIQ Reference #
EU0290	20,000 gallon Windshield Washer Fluid Underground Storage Tank	EP-44

Recordkeeping and Reporting Requirements:

1) For each storage tank subject to Subpart EEEE having a capacity greater than 5,000 gallon, that is not subject to control the permittee must submit the following information in either the Notification of Compliance Status, according to the schedule specified in Table 12 of Subpart EEEE or in your first Compliance report, according to the schedule specified in §63.2386(b), whichever occurs first. [40 CFR 63.2343(b)(1)(i)]
   a) Company Name and address;
   b) Statement by a responsible official, including the official's name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete;
   c) Date of report and beginning and ending dates of the reporting period; and
   d) A listing of all transfer racks(except those racks at which only unloading of organic liquids occurs) and of tanks greater than or equal to 5,000 gallons that are part of the affected source but are not subject to any of the emission limitations, operating limits, or work practice standards of Subpart EEEE.
2) If the first compliance report is submitted before the Notification of Compliance Status, the Notification of Compliance Status must contain the information specified in §63.2386(d)(3) and (4) if any of the following changes have occurred since the filing of the first Compliance report: [40 CFR 63.2343(b)(1)(ii)(A)]
   a) Any storage tank or transfer rack became subject to control under Subpart EEEE; or any storage tank equal to or greater than 5,000 gallons became part of the affected source but is not subject to any of the emission limitations, operating limits, or work practice standards of Subpart EEEE; or
   b) Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or
   c) Any of the information required in §63.2386(c)(1) through (3) has changed.
3) If the Notification of Compliance Status is submitted before the first compliance report, the first Compliance report must contain the information specified in §63.2386(d)(3) and (4) if any of the

changes mentioned above have occurred since filing the Notification of Compliance Status. [40 CFR 63.2343(b)(1)(ii)(B)]

4) The permittee must submit a subsequent compliance report according to the schedule in §63.2386(b) whenever any of the events mentioned above occur. [40 CFR 63.2343(b)(2)(i)]
5) The permittee must keep documentation, including a record of the annual average true vapor pressure of the organic HAP in the stored organic liquid that verifies the storage tank is not required to be controlled under Subpart EEEE. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to §63.10(b) (1), including records stored in electronic form in a separate location. [40 CFR 63.2386(b(3)]

PERMIT CONDITION 009

10 CSR 10-6.075
Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart DDDDD
National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

EU0390 & EU0400 Boilers		
Emission Unit	Description	2013 EIQ Reference #
EU0390	Four (4) Phosphate Boilers Commercial Phosphate Boiler 1 – 16.738 MMBtu/hr, natural gas fired, installed in 1995; Commercial Phosphate Boiler 2 – 16.738 MMBtu/hr, natural gas fired, installed in 1995; Passenger Phosphate Boiler 1 – 12.553 MMBtu/hr, natural gas fired, installed 1998; Passenger Phosphate Boiler 2 – 12.553 MMBtu/hr, natural gas fired, installed 1998	EP-61
EU0400	Process Heaters Murina Boiler Fan House – 4.0 MMBtu/hr, natural gas fired, installed 1998; Precision Boiler Fan House – 5.0 MMBtu/hr, natural gas fired, installed 2008; Commercial Emission Boiler – 8.369 MMBtu/hr, natural gas fired, installed 1989; Raypak Boiler – 1.825 MMBtu/hr, natural gas fired, installed 2002; New Commercial Wash Boiler – 2.1 MMBtu/hr, natural gas fired, installed 2003	EP-62

Operational Limitations:

1) The permittee must meet the applicable work practice standards in Table 3 of 40 CFR Part 63 Subpart DDDDD: [§63.7500(a)(1)]

Table 3 – Work Practice Standards

If your unit is . . .	You must meet the following . . .
1. A new or existing boiler or process heater with a continuous oxygen trim system that maintains an optimum air to fuel ratio, or a heat input capacity of less than or equal to 5 million Btu per hour in any of the following subcategories: unit designed to burn gas 1; unit designed to burn gas 2 (other); or unit designed to burn light liquid, or a limited use boiler or process heater	Conduct a tune-up of the boiler or process heater every 5 years as specified in § 63.7540.
2. A new or existing boiler or process heater without a continuous oxygen trim system and with heat input capacity of less than 10 million Btu per hour in the unit designed to burn heavy liquid or unit designed to burn solid fuel subcategories; or a new or existing boiler or process heater with heat input capacity of less than 10 million Btu per hour, but greater than 5 million Btu per hour, in any of the following subcategories: unit designed to burn gas 1; unit designed to burn gas 2 (other); or unit designed to burn light liquid	Conduct a tune-up of the boiler or process heater biennially as specified in § 63.7540.
3. A new or existing boiler or process heater without a continuous oxygen trim system and with heat input capacity of 10 million Btu per hour or greater	Conduct a tune-up of the boiler or process heater annually as specified in § 63.7540. Units in either the Gas 1 or Metal Process Furnace subcategories will conduct this tune-up as a work practice for all regulated emissions under Subpart DDDDD. Units in all other subcategories will conduct this tune-up as a work practice for dioxins/furans.
4. An existing boiler or process heater located at a major source facility, not including limited use units	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items a. to e. appropriate for the on-site technical hours listed in § 63.7575:
	a. A visual inspection of the boiler or process heater system.
	b. An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.

If your unit is . . .	You must meet the following . . .
	c. An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the permittee.
	d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
	e. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
	f. A list of cost-effective energy conservation measures that are within the facility's control.
	g. A list of the energy savings potential of the energy conservation measures identified.
	h. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

2) The permittee must at all times operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.7500(a)(3)]
3) The permittee must conduct a tune-up of all boilers or process heaters to demonstrate continuous compliance as specified in §63.7540(a)(10)(i) through (vi). [§63.7540(a)(10) and (11)]
4) Each annual tune-up must be no more than 13 months after the previous tune-up, each biennial tune-up must be conducted no more than 25 months after the previous tune-up, and each 5-year tune up must be conducted no more than 61 months after the previous tine-up. [§63.7515(d)]

Recordkeeping and Reporting:

1) The permittee must submit to the Director all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (6) and 63.9(b) through (h) that apply, by the date specified. [§63.7545(a)]
2) The permittee must keep a copy of each notification and report that is submitted to comply with Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that was submitted according to the requirements in §63.10(b)(2)(xiv). [§63.7555(a)(1)]
3) The permittee must submit each report in Table 9 of 40 CFR Part 63 Subpart DDDDD that is applicable. [§63.7550(a)]
4) All records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1) and must be kept for 5 years following the date of each record. Each record must be kept on site for at least two years following the date of each record. [§63.7560(a) through (c)]

PERMIT CONDITION 010

10 CSR 10-6.070
New Source Performance Regulations
40 CFR Part 60 Subpart Dc
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

EU0390 & EU0400 Boilers and Process Heaters		
Emission Unit	Description	2013 EIQ Reference #
EU0390	Commercial Phosphate Boiler 1 – 16.738 MMBtu/hr, natural gas fired, installed in 1995; Commercial Phosphate Boiler 2 – 16.738 MMBtu/hr, natural gas fired, installed in 1995; Passenger Phosphate Boiler 1 – 12.553 MMBtu/hr, natural gas fired, installed 1998; Passenger Phosphate Boiler 2 – 12.553 MMBtu/hr, natural gas fired, installed 1998	EP-61

Monitoring/Recordkeeping:

1) The permittee shall record and maintain records of the amount of each fuel combusted during each operating day. [§60.48c(g)(1)]
2) As an alternative , the permittee (when a facility that combusts only natural gas) may elect to record and maintain records of the amount of each fuel combusted during each calendar month; [§60.48c(g)(2)]or
3) The permittee (when the only fuels combusted in any steam generating unit at the property are natural gas) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]

Reporting:

1) The permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:
2) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
3) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.
4) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired. [§60.48c(a)(1), (2), (3)]

PERMIT CONDITION 011

10 CSR 10-6.075
Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart ZZZZ
National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

EU0410 – Existing Emergency Fire Pumps and Generator		
Emission Unit	Description	2013 EIQ Reference #
EU0410	Fire Pump #1 – 267 hp, compression ignition, fuel: diesel, installed 1990; Fire Pump #2 – 267 hp, compression ignition, fuel: diesel, installed 1990; Fire Pump# 3 – 310 hp, compression ignition, fuel: diesel, installed 1979; Fire Pump #4 – 310 hp, compression ignition, fuel: diesel, installed 1979; Fire Pump #7 – 300 hp, compression ignition, fuel: diesel, installed 2007; Fire Pump #8 – 300 hp, compression ignition, fuel: diesel, installed 2007; and Generator – 157 hp, spark ignition, fuel: natural gas, installed 2004;	EP-200

Emission Limitations:

1) The permittee must comply with the emission limitations and other requirements in Table 2c of Subpart ZZZZ that are applicable to the fire pumps and generator. [§63.6602(a)]

Table 2c – Requirements for Existing CI Stationary RICE Located at a Major Source of HAPs and Existing SI Stationary RICE ≤500 HP Located at a Major Source of HAP Emissions

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
1. Emergency stationary CI RICE	a. Change oil and filter every 500 hours of operation or annually, whichever comes first. b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

2) The permittee must be in compliance with Subpart ZZZZ at all times. [§63.6605(a)]
3) The permittee must at all times operate and maintain the emergency fire pumps and emergency generator in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.6605(b)]
4) The permittee must operate and maintain the emergency fire pumps and emergency generator according to the manufacturer's emission related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(a)(2)]
5) The permittee must demonstrate continuous compliance with each requirement in Table 2c according to the methods specified in Table 6 to Subpart ZZZZ. [§63.6640(a)]

Recordkeeping and Reporting:

1) The permittee must submit each report in Table 7 of Subpart ZZZZ that is applicable. [§63.6650(a)]
2) The permittee must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that are applicable by the dates specified. [§63.6645(a)]
3) The permittee must keep the following records: [§63.6655(a)(1) through (5)]
   a) A copy of each notification and report that was submitted to comply with Subpart ZZZZ;
   b) Records of the occurrence and duration of each malfunction of operation of the emission units;
   c) Records of performance tests and performance evaluations; and
   d) Records taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process to its normal or usual manner of operation.
4) Records must be maintained for five years in a form suitable and readily available for expeditious review according to §63.10(b)(1) [§63.6660(a) and (b)]

PERMIT CONDITION 012

10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds

EU0410 – Existing Emergency Fire Pumps and Generator		
Emission Unit	Description	2013 EIQ Reference #
EU0410	Fire Pump #1 – 267 hp, compression ignition, fuel: diesel, installed 1990; Fire Pump #2 – 267 hp, compression ignition, fuel: diesel, installed 1990; Fire Pump# 3 – 310 hp, compression ignition, fuel: diesel, installed 1979; Fire Pump #4 – 310 hp, compression ignition, fuel: diesel, installed 1979; Fire Pump #5 – 350 hp, compression ignition, fuel: diesel, installed 2013 Fire Pump #6 – 250 hp, compression ignition, fuel: diesel, installed 2013 Fire Pump #7 – 300 hp, compression ignition, fuel: diesel, installed 2007; Fire Pump #8 – 300 hp, compression ignition, fuel: diesel, installed 2007; and Generator – 157 hp, spark ignition, fuel: natural gas, installed 2004;	EP-200

Emission Limitation:

1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to burning fuel with a sulfur content less than 0.5%.

Monitoring/Recordkeeping:

1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable.
2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3) All records shall be maintained for five years.

Reporting:
The permittee shall report any deviations/exceedances of this permit condition using the annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

PERMIT CONDITION 013

10 CSR 10-6.060
New Source Performance Regulations
40 CFR Part 60 Subpart IIII
Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

EU0410 – New Emergency Fire Pumps		
Emission Unit	Description	2013 EIQ Reference #
EU0410	Fire Pump #5 – 350 hp, compression ignition, fuel: diesel, installed 2013; Fire Pump #6 – 350 hp, compression ignition, fuel: diesel, installed 2013;	EP-200

Emission Limitations:
The permittee shall comply with the emission standards in table 4 of Subpart IIII for all pollutants. [§60.4205(c)]:

Table 4 to Subpart IIII of Part 60 – emission Standards for Stationary Fire Pump Engines:

Maximum engine power	Model year(s)	NMHC + NO_X	CO	PM
225≤KW<450 (300≤HP<600)	2008 and earlier	10.5 (7.8)	3.5 (2.6)	0.54 (0.40)
	2009+[3]	4.0 (3.0)		0.20 (0.15)

Monitoring:
1) The permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions. [60.4211(a), (c)]
2) The permittee must install a non-resettable hour meter if one is not already installed. [60.4214(b)]
3) The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. [§63.6625(h)]

Continuous Compliance:
1) The permittee must operate and maintain the engine to achieve required emission standards over the entire life of the engine. [§60.4206]
2) The permittee must operate and maintain the engine (and any control device) according to the manufacturer's emission-related written instructions. [§60.4211(a)]
3) Engine must be certified to the applicable emission standards by the manufacturer and the engine must be installed and configured according to the manufacturer's emission-related specifications [§60.4211(c)]
4) The permittee must operate the engine within the time limitations in §60.4211(f)(1) through (3) to maintain the engine's status as an emergency engine.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
    a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exception:
3) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality.
    a) Yard waste, with the following exception:
        i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit.
4) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the permittee fails to comply with the conditions or any provisions of the permit.
5) The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the permittee provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Ford Motor Co. - Kansas City Assembly Plant fails to comply with the provisions or any condition of the open burning permit.
    a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the permittee can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
6) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.

7) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) The permittee may be required by the director to file additional reports.
3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170
Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
f) Permittees of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
a) Monitoring methods outlined in 40 CFR Part 64;
b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and

c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
      ii) 10 CSR 10-6.040, "Reference Methods";
      iii) 10 CSR 10-6.070, "New Source Performance Standards";
      iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
      iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1) June 21, 1999;
2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

c) Whether compliance was continuous or intermittent;
d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
   b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
   b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
   d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Kevin Gideon, Plant Manager. On December 27, 2011, the Air Pollution Control Program received a letter dated December 20, 2011, notifying a change of Responsible Official from Mr. Gideon to Mr. Daniel Jowiski, Plant Manager. If Mr. Jowiski terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A1
VOC Compliance Calculations and Worksheet

The calculation methods for demonstrating compliance with Special Condition 2 (A) of Construction Permit 072011-009 are described below. Table A provides an example worksheet that will be used to identify the sources of VOC 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

On each day of operation, the permittee shall record and maintain records of the total quantity of all materials used containing VOC at the facility. 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 30th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 30th of the month, the permittee shall calculate and record the following:

1. The total usage of VOC containing materials for the previous calendar month using the daily VOC usage records. The record shall also include the VOC content of each material as determined by (1) Material Safety Data Sheet, (2) laboratory test data or (3) product specification information, whichever is most representative for each material used; the record shall indicate the source of VOC 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 VOC contents of any material according to EPA reference methods. The amount of VOC used for each month shall be determined by multiplying the amount of VOC containing materials used by the VOC content of each material.

2. The VOC emissions for each emissions unit and the total facility for the previous month. VOC emissions shall be determined from the total VOC 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:

$$VOC\ emissions = VOC\ used\ (1 - capture\ efficiency\ x\ control\ efficiency)$$

Where:
-*VOC emissions* are expressed as pounds (or tons)
-*VOC 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 VOC emissions shall be calculated by summing the VOC emissions from each emissions unit.

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

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

Recordkeeping – Emission Factor or Emission Model Calculations

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 VOC 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 30th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 30th of the month, the permittee shall calculate and record the following:

1. The total usage of VOC 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) of Construction Permit 072011-009. Emission factors must be obtained from the most recent edition of AP-42, *Compilation of Air Pollutant Emission Factors*, the most recent stack test report, a mass balance approach (described above), and/or by a method approved by the Air Pollution Control Program. Documentation sufficient to support the emission factors must accompany Attachment A required by Special Condition 2(B) of Construction Permit 072011-009.

2. The VOC emissions for each emissions unit and the total facility for the previous month. VOC 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:

VOC emissions = Materials Used or Hours of Operation x Emission Factor

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

3. The twelve month rolling sum VOC emission for the previous twelve month period. This will be accomplished by summing the monthly VOC emissions data for the previous twelve months. This number shall be used to demonstrate compliance with Special Condition 2(A) of Construction Permit 072011-009.

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

Attachment A1 Continued:
Example Worksheet for VOC Emissions Calculation

This sheet covers the period from _____ to _____
(month, year) (month, year)

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
Point No.	**Emission Point**	**Emissions Calculation Method**	**Amount of Material Processed**	**Unit for Material Processed**	**Emission Factor**	**Units for Emission Factor**	**Capture Efficiency**	**Control Device DRE**
EP-1	Passenger Phosphate System	Mass Balance/Engineering						
EP-2	Passenger E-Coat Tank	Mass Balance						
EP-3	Passenger E-Coat Oven	Mass Balance/Emission Factor						
EP-4	Passenger Sealer Deck/Oven	Mass Balance/Emission Factor						
EP-5	Passenger PVC Booth	Mass Balance						
EP-6	Passenger PVC Oven	Mass Balance/Emission Factor						
EP-7	Passenger Guidecoat Booth	Mass Balance						
EP-8	Passenger Guidecoat Oven	Mass Balance/Emission Factor						
EP-9	Passenger Topcoat Booth 1	Mass Balance						
EP-10	Passenger Topcoat Booth 2	Mass Balance						
EP-11	Passenger Topcoat Oven 1	Mass Balance/Emission Factor						
EP-12	Passenger Topcoat Oven 2	Mass Balance/Emission Factor						
EP-13	Passenger Wax	Mass Balance						

EP-14	Commercial Phosphate System	Mass Balance/Engineering						
EP-15	Commercial E-Coat Tank	Mass Balance						
EP-16	Commercial E-Coat Oven	Mass Balance/Emission Factor						
EP-17	Commercial Sealer Deck/Oven	Mass Balance/Emission Factor						
EP-18	Commercial Guidecoat Booth	Mass Balance						
EP-19	Commercial Guidecoat Oven	Mass Balance/Emission Factor						
EP-20	Commercial Topcoat Booth	Mass Balance						
EP-21	Commercial Tutone Booth	Mass Balance						
EP-22	Commercial Topcoat Oven	Mass Balance/Emission Factor						
EP-23	Commercial Tutone Oven	Mass Balance/Emission Factor						
EP-24	Spot Repair	Mass Balance						
EP-25	Commercial Blackout Booth	Mass Balance						
EP-26	Final Repair Booths	Mass Balance						
EP-27	Final Repair Ovens	Mass Balance/Emission Factor						
EP-28	NA	NA						
EP-29	Paint Stripper	Mass Balance/Engineering						
EP-30	NA	NA						
EP-31	Passenger Blackout Booth	Mass Balance						
EP-32	NA	NA						
EP-33	Powerhouse Boilers #2 and #3	Emission Factor						
EP-34	Miscellaneous Boilers and Space Heat	Emission Factor						
EP-35	Solvent Degreasers	Mass Balance						
EP-36	Powerhouse Boiler #1	Emission Factor						
EP-37	Gasoline UST (3)	Emission Factor						

EP-38	Scrap Paint and Spent Solvent Tanks	Mass Balance						
EP-39	NA	NA						
EP-40	Scuff Booths (5)	Emission Factor						
EP-41	NA	NA						
EP-42	Miscellaneous Solvent Use	Mass Balance						
EP-43	Petroleum Tanks (3)	Emission Factor						
EP-44	20,000 Gallon Windshield Washer Fluid UST	Emission Factor						
EP-45	Waste Oil AST	Emission Factor						
EP-46	Paint Mix Rooms	Mass Balance						
EP-47	Passenger Ditch Molding	Mass Balance						
EP-48	Passenger Quarterglass Install	Mass Balance						
EP-49	Passenger Body Shop	Mass Balance/Emission Factor						
EP-50	Fluid Fill Operations	Mass Balance						
EP-51	Wastewater Treatment Plant	Emission Factor						
EP-52	Product Storage Tanks	Emission Factor						
EP-53	Fluidized Bed Skid Cleaner	Mass Balance/Engineering						
EP-54	Passenger Purge and Clean	Mass Balance						
EP-55	Passenger Windshield Glass Install	Mass Balance						
EP-56	Commercial Body Shop	Mass Balance/Emission Factor						
EP-57	Commercial Purge and Clean	Mass Balance						
EP-58	Commercial Windshield Glass Install	Mass Balance						

Attachment A2
Ford Motor Company Kansas City Assembly Plant

The calculation methods for demonstrating compliance with Special Condition 2 (A) of Construction Permit 072011-009 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 PM_{10} 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 30th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 30th 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, whichever 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:

$$PM\ emissions = PM\ used\ (1 - capture\ efficiency\ x\ control\ efficiency)$$

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)

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

4. 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) of Construction Permit 072011-009.

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 30th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 30th 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) of Construction Permit 072011-009. 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) of Construction Permit 072011-009.

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:

Pollutant emissions = Materials Used or Hours of Operation x 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.

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

4. 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) of Construction Permit 072011-009.

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 30th of the month and must state if an exceedance of the PAL limit is expected. If a request is not made, by the 30th 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) of Construction Permit 072011-009.
    a. Emission factors must be obtained from the most recent test performance as specified under Special Condition 10 and 11 of Construction Permit 072011-009. 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) of Construction Permit 072011-009.
    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) of Construction Permit 072011-009.

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:

Pollutant emissions = Materials Used or Hours of Operation x Emission Factor

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

4. 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) of Construction Permit 072011-009.

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

Attachment B
Natural Gas Usage Tracking 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:

This sheet covers the period from _____ to _____.

Month	Equipment Description (Note 1)	Amount of Natural Gas Used (Note 1)	Monthly Natural Gas Usage (Note 2)	12-Month Total (Note 3)

Note1: Description of equipment using natural gas and the amount of natural gas used.
Note 2: Total monthly natural gas usage at the entire installation.
Note 3: Sum of last 12-months of Monthly Natural Gas Usage. A 12-Month Total usage not in excess of 3,478 million standard cubic feet per minute indicates compliance..

Attachment C

Pre-Approved Changes
Ford Motor Company Kansas City Assembly Plant
Clay County, S27, T51, R32
Installation ID Number: 047-0019

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		
			(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, 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]
			(2) emission control equipment using natural gas and/or propane	VOC, HAP, 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]
	(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, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230, [Control of Emissions From Industrial Surface Coating Operations]
	(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, 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]
			(3) emission control equipment using natural gas and/or propane	VOC, HAP, 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]

	(e)	EU0050 Passenger 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, 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]
			(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, 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]
	(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, 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]
			(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, 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]
	(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, 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]
			(1) welding and/or grinding equipment	PM		
	(k)	EU0120 Commercial Body Shop	(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]
	(l)	EU0130 Commercial Electrocoat (E-Coat)	(1) (E-Coat) oven burners	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],
			(2) emission control equipment	VOC, HAP, 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]
	(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, 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]

			(4) emission control equipment using natural gas and/or propane	VOC, HAP, 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]
	(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, 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]
			(4) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	
			(5) emission control equipment	VOC, HAP, 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]
	(o)	EU0160 Commercial 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 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]
			(3) topcoat oven burners 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]
			(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, 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]
	(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, 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]
	(r)	EU0230 E-Lab Boiler	natural gas fired boiler with propane and/or fuel oil backup	PM10, 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]
	(s)	EU0240 Fitness Room Boiler	natural gas fired boiler with propane and/or fuel oil backup	PM10, 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, 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 IIII	
	(w)	Passenger Spent Solvent Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
	(x)	Passenger Phosphate Boiler	boiler using natural gas and/or propane	PM10, SOx, NOx CO		
	(y)	Passenger Fluid Fill	dispensing equipment	VOC, HAP		
	(z)	Passenger 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	
	(aa)	Commercial Scrap Paint Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
	(bb)	Commercial Spent Solvent Tank	tank and piping.	VOC, HAP	40 CFR 63 Sub IIII	
	(cc)	Commercial Phosphate Boiler	boiler using natural gas and/or propane	PM10, SOx, NOx CO		
	(dd)	Commercial	dispensing	VOC, HAP		

		Fluid Fill	equipment			
	(ee)	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	
	(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, SOx, NOx CO		
	(kk)	Boilers	boilers using natural gas and/or propane	PM10, SOx, NOx CO		
	(ll)	Air Supply Houses	booth air supply houses using natural gas and/or propane	PM10, SOx, NOx CO		
	(mm)	Hot Water Heaters	hot water heaters using natural gas and/or propane	PM10, SOx, NOx CO		
	(nn)	Sprayable Bedliner	sprayable bedliner booth and application equipment	VOC, HAP, PM	40 CFR 63 Sub IIII	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 IIII	
	(pp)	UV Cure Coating Application/ Oven	UV Cure coatings, application equipment, and curing equipment	VOC, HAP, PM	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]
	(qq)	Body Shop	new body shop for future vehicle using natural gas and/or propane	VOC, HAP, PM, PM10, SOx, NOx CO	40 CFR 63 Sub IIII	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, 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 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 (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]

			(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, 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]
			(4) emission control equipment using natural gas and/or propane	VOC, HAP, 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]
	(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, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230 [Control of Emissions From Industrial Surface Coating Operations]
			(4) emission control equipment using natural gas and/or propane	VOC, HAP, PM10, SOx, NOx CO	40 CFR 63 Sub IIII	10 CSR 10-2.230, 230 [Control of Emissions From Industrial Surface Coating Operations]
	(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, 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]
			(3) emission control equipment using natural gas and/or propane	VOC, HAP, 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]
	(e)	EU0050 Passenger 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, 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]
			(6) guidecoat oven burners 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]
			(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, 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]
	(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]
			(5) topcoat ovens (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]
			(6) topcoat oven burners 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]
			(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, 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]
	(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]
			(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, 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]
	(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]
			(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, 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]
			(4) emission control equipment using natural gas and/or propane	VOC, HAP, 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]
	(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, 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]
			(4) emission control equipment using natural gas and/or propane	VOC, HAP, 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]

	(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, 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]
			(6) guidecoat oven burners 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]
			(7) purge solvent recovery equipment	VOC, HAP	40 CFR 63 Sub IIII, 40 CFR 60 Sub MM	
			(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, 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]
	(o)	EU0160 Commercial 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]
			(5) topcoat ovens (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]
			(6) topcoat oven burners 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]
			(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, 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]
	(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, 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]
	(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, 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, 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 Booths (5)	scuff booths using natural gas and/or propane	PM10, SOx, NOx CO		10 CSR 10-6.400 [Restriction of Emission of Particulate Matter From 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, SOx, NOx CO		
	(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, SOx, NOx CO		
	(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, SOx, NOx CO		
	(pp)	Boilers	boilers using natural gas and/or propane	PM10, SOx, NOx CO		
	(qq)	Air Supply Houses	booth air supply houses using natural gas and/or propane	PM10, SOx, NOx CO		
	(rr)	Hot Water Heaters	hot water heaters using natural gas and/or propane	PM10, SOx, NOx CO		
(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 that 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.

Attachment D
Processes Added/Removed/Modified under Attachment C, Pre-Approved Changes

This sheet covers the period from _____ to _____.

Emission Point (Note 1)	Equipment Description (Note 1)	Pre-Approved Change Category (Note 1)	Equipment Action (Note 2)	Date of Action (Note 3)

Note 1: Description of equipment being added/removed/modified including emission point identification and category of pre-approved change. This log shall include any equipment/process that is added or removed from the calculation of annual VOC emissions as listed in Attachment A.

Note 2: Any equipment being added, removed, or modified from the emissions calculation sheet (Attachment A) must be listed.

Note 3: If equipment is being added, list date of commencement of operation (including startup). If equipment is being removed, list date of removal from installation.

Attachment E

This sheet or an equivalent may be used to satisfy pressure drop record keeping requirements.

Pressure Drop (or other parameter) Log for Control Equipment

Control Device ID	Date (Month/date/year)	Pressure Drop (inches water)	Other measured parameter	Within specifications? (Yes/No)

Attachment F

This sheet or something similar may be used to help show compliance with inspection, maintenance, repair and malfunction record keeping requirements in the permit.

Inspection/Maintenance/Repair/Malfunction Log

Date	Equipment/Emission Unit	Activities Performed

Attachment G
Fugitive Emission Observations

Date	Time	Visible Emissions					Abnormal Emissions		Initial
		Beyond Boundary		Less Than Normal	Normal	Greater Than Normal	Cause	Corrective Action	
		No	Yes						

Attachment H
Emergency Equipment Worksheet

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

This sheet covers the period from _____ to _____.
(Month, Year) (Month, Year)

Copy as needed.

Date (month/year)	Emergency Equipment Identification	Hours of Operation	12-Month Total *

*12-month total is determined by the addition of the current month to the total of the previous 11 months. A number of 500 hours of operation for the emergency generator is considered to be in compliance.

Attachment I

Table 1 to Subpart IIII of Part 63—Operating Limits for Capture Systems and Add-On Control Devices

If you are required to comply with operating limits by §63.3093, you must comply with the applicable operating limits in the following table

For the following device . . .	You must meet the following operating limit . . .	And you must demonstrate continuous compliance with the operating limit by
1. Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.3167(a)	i. Collecting the combustion temperature data according to §63.3168(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average combustion temperature at or above temperature limit.
2. Catalytic oxidizer	a. The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to §63.3167(b); and either	i. Collecting the temperature data temperature according to §63.3168(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature before the catalyst bed at or above the temperature limit.
	b. Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to §63.3167(b)(2); or	i. Collecting the temperature data according to §63.3168(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature difference at or above the temperature difference limit; or
	c. Develop and implement an inspection and maintenance plan according to §63.3167(b)(4)	i. Maintaining an up-to-date inspection maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by §63.3167(b)(4), you must take corrective action as soon as practicable consistent with the manufacturer's recommendations.
3. Regenerative carbon adsorber	a. The total regeneration desorbing gas (*e.g.*, steam or nitrogen) mass flow for each carbon bed regeneration cycle must not fall below the total regeneration desorbing gas mass flow limit established according to §63.3167(c)	i. Measuring the total regeneration desorbing gas (*e.g.*, steam or nitrogen) mass flow for each regeneration cycle according to §63.3168(d); and ii. Maintaining the total regeneration desorbing gas mass flow at or above the mass flow limit.

	b. The temperature of the carbon bed after completing each regeneration and any cooling cycle must not exceed the carbon bed temperature limit established according to §63.3167(c)	i. Measuring the temperature of the carbon bed after completing each regeneration and any cooling cycle according to §63.3168(d); and ii. Operating the carbon beds such that each carbon bed is not returned to service until completing each regeneration and any cooling cycle until the recorded temperature of the carbon bed is at or below the temperature limit.
4. Condenser	a. The average condenser outlet (product side) gas temperature in any 3-hour period must not exceed the temperature limit established according to §63.3167(d)	i. Collecting the condenser outlet (product side) gas temperature according to §63.3168(e); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas temperature at the outlet at or below the temperature limit.
5. Concentrators, including zeolite wheels and rotary carbon adsorbers	a. The average desorption gas inlet temperature in any 3-hour period must not fall below the limit established according to §63.3167(e)	i. Collecting the temperature data according to §63.3168(f); ii. Reducing the data to 3-hour block averages; and iii. maintaining the 3-hour average temperature at or above the temperature limit.
6. Emission capture system that is a PTE	a. The direction of the air flow at all times must be into the enclosure; and either b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or c. The pressure drop across the enclosure must be at least 0.007 inch water, as established in Method 204 of appendix M to 40 CFR Part 51	i. Collecting the direction of air flow, and either the facial velocity of air through all natural draft openings according to §63.3168(g)(1) or the pressure drop across the enclosure according to §63.3168(g)(2); and ii. Maintaining the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times.
7. Emission capture system that is not a PTE	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to §63.3167(f). This applies only to capture devices that are not part of a PTE that meets the criteria of §63.3165(a) and that are not capturing emissions from a downdraft spray booth or from a flashoff area or bake oven associated with a downdraft spray booth	i. Collecting the gas volumetric flow rate or duct static pressure for each capture device according to §63.3168(g); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.

Attachment J
Process Rate, Emission Limitation and Emission Rate Log for Spray Booths
Record Keeping Requirement for PERMIT CONDITION 005

Date	Emission Unit	Process Rate[1] (tons/hr)	PM Emission Limitation[2] (lb/hr)	PM Emission Factor[3] (lb/unit)	PM Emission Rate from the System[4] (lb/hr)

[1] Process Weight = (Gallons Paint Used) x (Density of Paint (lb/gallon)) x (% Solids) / 2000
[2] Emission Limitation = Limitation according to equations in 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
[3] Emission Factor = [(100-Transfer Efficiency)/100] x [((Capture Efficiency/100) x ((100-Control Efficiency)/100) + ((100-Capture Efficiency)/100)]
[4] PM Emission Rate From System = (Process Weight) x (Emission Factor). Emission Rate less than Emission Limitation demonstrates compliance.

Attachment J-2 –
Source Gas Volume, Emission Limitation and Emission Rate Log for Spray Booths
Record Keeping Requirement for PERMIT CONDITION 005

Emission Unit	Description	Emission Point	Source Gas Volume (SCFM)	Emission Factor (lb/veh)	MHDR (veh/hr)	Uncontrolled Emission* (gr/scf)	Emission Limit** (gr/scf)
EU0050	Passenger Guidecoat	EP-07	84,000	0.00053	60	0.0000438	0.045
EU0060	Passenger Topcoat Booth 1	EP-09	92,640	0.000579	60	0.0000438	0.042
EU0060	Passenger Spot Repair	EP-24	50,000	0.004	60	0.001	0.05
EU0070	Passenger Wax Booth	EP-13	98,000	0.042	60	0.003	0.042
EU0080	Passenger Blackout Booth	EP-31	58250	0.178	60	0.021	0.05
EU0090	Passenger Final Repair	EP-26	29,010	0.1	60	0.024	0.062
EU0150	Commercial Guidecoat	EP-18	393,880	1.06	55	0.017	0.027
EU0160	Commercial Topcoat Booth	EP-20	686,788	1.48	55	0.014	0.023
	Commercial Tutone Booth	EP-21	560,804	1.2	55	0.014	0.025
	Commercial Spot Repair	EP-24	29,920	0.004	55	0.001	0.062
EU0170	Commercial Blackout Booth	EP-25	40,046	0.178	55	0.029	0.057
EU0180	Commercial Final Repair	EP-26	29,010	0.1	55	0.022	0.062

* Uncontrolled Emission Rate = [Emission Factor (lb/veh) x MHDR (veh/hr) x 7,000 (gr/lb)] / [Air Flor Rate (scf/min) x 60 (min/hr)]
** Emission Limit determined by interpolating data in Table 1 of 10 CSR 10-6.400(3)(A)2.
Note: If the permittee demonstrates compliance with this table rather than using Attachment I, all factors which determine the volume and the methods of determining and computing the volume shall be recorded and retained by the permittee.

Attachment K

10 CSR 10-2.210
Purchase Records for Cold Cleaning Solvent

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Attachment L

10 CSR 10-2.210
Solvent Containing Waste Transfer Log

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Attachment M

10 CSR 10-2.210
Employee Solvent Metal Cleaning Training Log

Date	Title of Solvent Metal Cleaning Training Course	Instructor

STATEMENT OF BASIS

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Part 70 Operating Permit Application, received April 26, 2013;
2) 2012 Emissions Inventory Questionnaire, received April 30, 2013; and
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
4) WebFIRE;
5) Permit to Construct No.072011-009, issued July 20, 2011; and
6) Permit to Construct No. 042008-001, issued March 31, 2008.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-2.215, *Control of Emissions from Solvent Cleanup Operations*
EP-42 includes miscellaneous solvent-containing material usage related to maintenance activities including non-manufacturing area cleaning, facility painting, and other activities. As stated in 10 CSR 2.215(1)(C), these activities are not subject to this regulation, therefore EP-42 was included in the list of Emission Units Without Limitations.

10 CSR 10-2.040, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*
This regulation which was applied to boilers and space heaters in the previous operating permit no longer applies to this facility because it was rescinded on October 30, 2011.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*
This regulation does not apply to the boilers and process heaters in this facility because they burn only natural gas and are exempt according to 10 CSR 10-6.405(1)(C).

Construction Permitting History

The following construction Permits have been issued to this facility:

Permit Number	Description
1176-010 through 014	New processes
1177-005 through 006	Storage tanks
1277-005 through 006	Steam boilers
0678-008	Painting
0779-014	Spray booth modifications
1084-003	Paint shop modifications
0386-003	Truck E-coat modifications
0187-005	Eight paint repair booths
1187-002	Sealer oven
1089-001	Replacement paint shop
0990-009	New guidecoat system
0690-016	Protective transit coating application equipment
0590-001	Commercial sealer bake oven replacement
1089-001A	Consent Decree
0692-016	Dual pass PVC enclosure and IR gel oven
0293-003	Replacement of blackout booth (water base) with an air house
1193-015	Automation of passenger car underbody sealer application
0594-034	Modification of the tutone/repair system into a main enamel spraybooth and oven system and designation as main enamel No. 2
0694-020	Installation of adhesive application station
0293-003A	Modification to compliance reporting for blackout booth
112000-014	Installation of six (6) low-NO_x, direct-fired, natural gas space heaters with individual heat input capacities of 20 million british thermal units per hour.
082001-022	Installation of two (2) worker stations for application of glass cleaner and glass primer to vehicle quarter glass, which is subsequently installed onto a vehicle with adhesive by robot.
082001-022A	Amended the wording of the special conditions to apply only to the two worker stations instead of the whole installation.
112000-014A	Installation of seven (7) 20 MMBtu/hr space heaters rather than six (6) space heaters.
042006-012	Fluidized bed skid cleaner
072007-004	Modification of the Main Enamel Booth (EP-20) by moving paint applicators from fixed positions to robotic arms
042008-001	PAL Permit for VOC with pre-approved changes
072011-009	PAL Permit for PM_{10}, $PM_{2.5}$, NO_x, SO_x, and CO with pre-approved changes

Under the Plant-Wide Applicability Limit (PAL) Permits (permits Nos. 042008-001 and 072011-009),

the permittee will be allowed to construct pre-approved changes at the installation with little advance notice. The pre-approval of certain types of physical and operational changes in these permits is designed, in part, to facilitate the facility's implementation of pollution prevention projects. These permits grant Ford Motor Company the authority to make changes quickly that will meet market demands and give the company flexibility in making these changes.

The conditions in PAL permit 042008-001 supersede all special conditions found in the following previously issued construction permits and amendments from the Air Pollution Control Program:

Permit Number
0678-008
1084-003 through 009
0386-003
0990-009
0690-016
0590-001
1089-001A
0293-003
1193-015
0594-034
0293-003A
112000-014
082001-022
082001-022A
112000-014A
042006-012

The conditions in PAL permit 072011-009 supersede Special Conditions 23 *Emission Limitation for Non VOC pollutants* and Special Condition 24(A) *Nitrogen Oxide Limitation from Permit 112000-014(A)*

At the time of the operating permit issuance Ford Motor Company has submitted five notifications of actual construction of a Pre-Approved Change:

Project No.	Emission Unit ID	Emission Unit Name	Emission Point Name	Status	Pre-Approved Change ID
2008-07-086	EU0160	Commercial Topcoat	Flexible robotic clearcoat paint applicators	New	(2)(o)(1)
2011-10-055	EU0010	Passenger Body Shop	Welding	Modified	(2)(a)
	EU0010	Passenger Body Shop	Sealing	Modified	(2)(a)
	EU0020	Passenger E-Coat	Dip Tank	Dismantled/New	(1)(b)
	EU0020	Passenger E-Coat	Oven	Unchanged	N/A
	EU0020	Passenger E-Coat	RTO	Unchanged	N/A

Project No.	Emission Unit ID	Emission Unit Name	Emission Point Name	Status	Pre-Approved Change ID
	EU0030	Passenger Sealer	Sealer Deck	Modified	(2)(c)
	EU0030	Passenger Sealer	Sealer Oven	New	(1)(c)
	EU0040	Passenger PVC Enclosure	PVC Enclosure	Unchanged	N/A
	EU0050	Passenger Guidecoat	Guidecoat Booth	New	(1)(e) and (1)(11)
	EU0050	Passenger Guidecoat	Guidecoat Oven	Dismantled	N/A
	EU0060	Passenger Topcoat	Topcoat Booths	Dismantled/New	(1)(f) and (1)(11)
	EU0060	Passenger Topcoat	Topcoat Oven	Dismantled/New	(1)(f)
	EU0060	Passenger Topcoat	RTO	Unchanged	N/A
	EU0070	Passenger Wax	Wax Booth	New	(1)(g) and (1)(11)
	EU0080	Passenger Blackout	Blackout Booth	Unchanged	N/A
	EU0090	Passenger Final Repair	Final Repair Booth	Unchanged	N/A
	EU0100	Passenger Glass Install	Glass Install	Modified	(2)(j)
	N/A	Passenger Fluid Fill (EP50)	Fluid Fill	Modified	(2)(y)
	N/A	Passenger Mix Room (EP46)	Mix Room	Dismantled/New	(1)(z)
	New	Stamping Plant	Stamping Operations	New	(1)(rr)
	New	Stamping Plant	Space Heat	New	(1)(jj)
	New	Paint Shop	Space Heat	New	(1)(jj)
	New	Haul Road	Stamping Road	New	N/A
2012-12-034	EU0010	Passenger Body Shop	Welding	Modified	(2)(a)
	EU0010	Passenger Body Shop	Sealing	Modified	(2)(a)
	EU0020	Passenger E-Coat	Dip Tank	Dismantled/New	(1)(b)
	EU0020	Passenger E-Coat	Oven	Unchanged	N/A
	EU0020	Passenger E-Coat	RTO	Unchanged	N/A
	EU0030	Passenger Sealer	Sealer Deck	Modified	(2)(c)
	EU0030	Passenger Sealer	Sealer Oven	New	(1)(c)
	EU0040	Passenger PVC Enclosure	PVC Enclosure	Unchanged	N/A
	EU0050	Passenger Guidecoat	Guidecoat Booth	New	(1)(e) and (1)(11)
	EU0050	Passenger	Guidecoat Oven	Dismantled	N/A

Project No.	Emission Unit ID	Emission Unit Name	Emission Point Name	Status	Pre-Approved Change ID
		Guidecoat			
	EU0060	Passenger Topcoat	Topcoat Booths	Dismantled/New	(1)(f) and (1)(11)
	EU0060	Passenger Topcoat	Topcoat Oven	Dismantled/New	(1)(f)
	EU0060	Passenger Topcoat	RTO	Unchanged	N/A
	EU0070	Passenger Wax	Wax Booth	New	(1)(g) and (1)(11)
	EU0080	Passenger Blackout	Blackout Booth	Dismantled	N/A
	EU0090	Passenger Final Repair	Final Repair Booth	Unchanged	N/A
	EU0100	Passenger Glass Install	Glass Install	Modified	(2)(j)
	N/A	Passenger Fluid Fill	Fluid Fill	Modified	(2)(y)
	N/A	Passenger Mix Room	Mix Room	Dismantled/New	(1)(z)
	New	Stamping Plant	Stamping Operations	New	(1)(rr)
	New	Stamping Plant	Space Heat	New	(1)(jj)
	New	MSC Building	Space Heat	New	(1)(jj)
	New	Body Shop	Space Heat	New	(1)(jj)
	New	Paint Shop	Space Heat	New	(1)(jj)
	New	Haul Road	Stamping Road	New	N/A
2013-05-057	New	Space Heaters	EP-34	New	(i)(jj)
	EU0120	Commercial Body Shop	Welding	Modified	(2)(k)
	EU0120	Commercial Body Shop	Sealing	Modified	(2)(k)
2013-12-040	EU0130	Commercial Electrocoat (E-coat)	E-Coat Oven	Modified	2(1)(1)
	EU0140	Commercial Sealer	Sealer Deck (PVC)	Modified	(2)(m)(1)
	EU0140	Commercial Sealer	Sealer Oven	Modified	(2)(m)(2)
	EU0150	Commercial Guidecoat	Guidecoat Booth	Modified	2(n)(1) and (2)
	EU0150	Commercial Guidecoat	Guidecoat Oven	Modified	2(n)(6)
	EU0160	Commercial Topcoat	Topcoat Booth	Modified	2(o)(1) and (2)
	EU0160	Commercial Topcoat	Topcoat Oven	Modified	2(o)(5) and (6)
	EU0190	Commercial Glass	Glass Install	Modified	2(r)(1)

Project No.	Emission Unit ID	Emission Unit Name	Emission Point Name	Status	Pre-Approved Change ID
		Install	Applicators		

Changes made to Special Condition 9.B of Construction Permit 042008-001:

Condition 9.B of this permit requires the permittee to conduct an assessment of thermal oxidizer valve operation and leakage as part of the maintenance and inspection activities at least "annually." The permittee requested that this be changed to at least once every 18 months. The permittee explained that these assessments require entry into the thermal oxidizer and must be conducted during extending downtime periods after the equipment has cooled. Plant shutdowns no longer occur at specific points in the year but rather occur in conjunction with model changeover which doesn't always occur every 12 months. By changing this requirement to 18 month, it also matches the CAM requirements, allows for safe performance of the assessment and ensures that the equipment can operate properly. This permit condition is included in the operating permit under Plant wide permit condition PW001 13B(2).

Changes made to Attachment B of Construction Permit 072011-009:

Attachment B of Construction Permit 072011-009 includes a list of Pre-Approved Changes allowed under the PAL Permit. The table includes the emission units and a list of applicable standards (both federal and state regulations). Several units were listed as regulated under 10 CSR 10-2.040, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*. This rule has was rescinded on October 30, 2011 and replaced by 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating.* The new rule was updated to exempt sources that burn only natural gas and/or propane, therefore this rule does not apply to the units listed in the table and was removed from the attachment.

Similarly, 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* has been updated since the issuance of Construction Permit 072011-009 to exempt units burning natural gas and therefore was removed from the list of applicable standards where appropriate.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978;*
40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984; and*
40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.*
EU0260 (three 20,000 gallon gasoline USTs) constructed in 1989 are not subject to NSPS Kb as they serve as part of the gasoline service stations which are exempted from Subpart Kb under 40 CFR 60.110(B)(D)(6). Gasoline Service Stations are defined as "any site where gasoline is dispensed to motor vehicle fuel tanks from stationary storage tanks" in 40 CFR 60.111b. These storage tanks are used to fill new vehicle fuel tanks and are therefore not subject to this regulation.

40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Stem Generators for Which Construction is Commenced After August 17, 1971*
This regulation does not apply to the boilers at this facility because they have a maximum heat input rate less than 250 MMBtu/hr.

40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units*
This regulation does not apply to the boilers at this facility because they do not meet the definition of electric utility steam generating units.

40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*
This regulation does not apply to the boilers at this facility because they have a maximum heat input rate less than 100 MMBtu/hr.

40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*
While there are no specific emission limitations for units burning only natural gas, this regulation contains recordkeeping and reporting requirements that are applicable to the following emission units at this facility (It is included in the operating permit under Permit Condition 010):

Equipment Description	Rated Heat Input Capacity (MMBtu/hr)	Year Installed
Commercial Phosphate Boiler 1	16.738	1995
Commercial Phosphate Boiler 2	16.738	1995
Passenger Phosphate Boiler 1	12.553	1998
Passenger Phosphate Boiler 2	12.553	1998

40 CFR Part 60 Subpart MM, *Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations*
Subpart MM is applicable to both the Passenger Paint line (EU0020, EU0050 and EU0060) and the Commercial Paint Line (EU0130, EU0150 and EU0180). It is included in this permit under Permit Condition 003.

40 CFR Part 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*
New Fire Pumps #5 and #6 are subject to this regulation. It is included in this operating permit as Permit Condition 013.

40 CFR Part 60 Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*
There are no spark ignition internal combustion engines at this facility therefore this regulation does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

The provisions of Subpart T apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than five percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent are not covered under the provisions of Subpart T.

The permittee uses covered parts washers ranging from twenty gallons to fifty-five gallons. These units do not use halogenated solvents as defined in 40 CFR 63.460, therefore the parts washers are not subject to the MACT standards for halogenated solvent cleaning.

40 CFR Part 63 Subpart IIII, *National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks*
Subpart IIII established national emission standards for hazardous air pollutants for facilities which surface coat new automobile or light-duty truck bodies or body parts for new automobiles or new light-duty trucks. Subpart IIII also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Subpart IIII applies to this facility by definition and is included in the operating permit under Permit Condition 001.

40 CFR Part 63, Subpart EEEE, *National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)*
This regulation applies to Emission Unit EU0290 20,000 gallon methanol UST (windshield washer fluid). However, no unit specific conditions apply. Since the stored liquid is not crude oil and the average true vapor pressure is not between 4.0 and 11.1 psia, there are no emission limits or required controls applicable to this unit. There are record keeping and report requirements for this unit that are included in the operating permit under Permit Condition 007. The requirements of Subpart EEEE are included in this permit under permit condition 008.

40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*
This regulation applies to the following emission units which are natural gas fired only and is included in the permit under Permit Condition 009:

Equipment Description	Rated Heat Input Capacity (MMBtu/hr)	Installation Date
Murina Boiler Fan House	4.0	1998
Precision Boiler Fan House	5.0	2008
Commercial Phosphate Boiler 1	16.738	1995
Commercial Phosphate Boiler 2	16.738	1995
Commercial Emission Boiler	8.369	1989
Raypak	1.825	2002
Passenger Phosphate Boiler 1	12.553	1998
Passenger Phosphate Boiler 2	12.553	1998
New Commercial Wash Boiler	2.1	2003
Commercial Prime Desorption Boiler	2.8	1989

Commercial Topcoat Desorption Boiler	8.0	1989

40 CFR Part 63 Subpart JJJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*
This regulation does not apply the boilers and process heaters at this facility because it is a major source of hazardous air pollutants (HAPS).

40 CFR Part 63 Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
This regulation applies to the following Emergency equipment and is included in the operation permit under Permit Condition 011:

Equipment Description	Rated HP	Fuel Type	Ignition Type	Purchase Date
Fire Pump #1	267	Diesel	CI	1990
Fire Pump #2	267	Diesel	CI	1990
Fire Pump #3	310	Diesel	CI	1979
Fire Pump #4	310	Diesel	CI	1979
Fire Pump #5	300	Diesel	CI	Pre-2007
Fire Pump #6	300	Diesel	CI	Pre-2007
Generator	157	Natural Gas	CI	2004

40 CFR Part 63 Subpart CCCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*
This regulation does not apply to this installation because it is a major source of haps and Subpart CCCCCC only applies to gasoline dispensing facilities located at an area source of haps.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and

- Has pre-control emissions that exceed or are equivalent to the major source threshold.

This Part is applicable to the Passenger Paint Line and the Commercial Paint line which include certain emission points associated with the following Emission Units: EU0020 – Passenger Electrocoat (E-Coat), EU0060 – Passenger Topcoat, EU0130 – Commercial Electrocoat (E-Coat), EU0150 – Commercial Guidecoat, and EU0160 – Commercial Topcoat. Four indicators of compliance for the VOC Oxidizer System make up the CAM plan: temperature in the combustion chamber; temperature of concentrator in desorption gas inlet; work practice and inspection; and performance testing. The CAM plan requirements are included in the operating permit under Permit Condition 004 and are detailed in Table 1: VOC Oxidizer System for Passenger and Commercial Paint Line, which can be found within the permit condition.

Greenhouse Gas Emissions

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO_2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2 emissions were not included within this permit. The applicant is required to report the data directly to EPA. The public may obtain CO_2 emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)[1]
CO	235.8
HAP	major
NO_x	173.9
PM_{10}	111.7
PM_{25}	106.7
SO_x	55.5
VOC	2,363

- Potential to emit was taken from construction permit No. 04008-001, issued March 31, 2008 and construction permit No. 072011-009, issued July 20, 2011.
- The PTE for CO, NO_x, PM_{10}, $PM_{2.5}$ SO_x and VOC are the plant wide applicability limits from these construction permits.
- Potential emissions of HAPs were not calculated due to the flexibility of the PAL permits.

Other Regulatory Determinations

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This regulation was not applied to the boilers and process heaters at this facility because they burn only natural gas and while the limits are still applicable to these units, it is very unlikely that the burning of natural gas as fuel could ever exceed the emission limits.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
Ford utilizes welding operations to assemble vehicle bodies in the Body Shop in preparation for painting and final assembly. The welding operations assemble both various vehicle sub-assemblies and the assemblies and additional parts together to form vehicle bodies. All welding operations in the Body Shop are Resistance Spot Welding operations utilizing copper electrodes of various sizes. No other types of welding are utilized in the Body Shop (arc welding, etc.).

For determining the Potential to Emit particulate matter for welding operations the following worst-case assumptions were made:

- F-150 body assembly has the most welds per vehicle and all calculations are made assuming exclusive production of F-150s.
- All electrode loss is assumed to be due to welding.
- It was assumed that all welds were made with the largest electrode and larges weight loss per electrode.
- Ford utilizes copper electrodes for all resistance spot welding operations.
- Ford assumed that resistance spot welding electrodes emit at similar rates to arc welding.
- The highest emission factor for any arc welding operation was assumed for all Ford resistance spot welding operations.
- The lifetime of an individual electrode was determined based on actual electrode replacement maintenance tasks at the plant.

The following parameters were used in emission estimations:

- No. of welds per larges vehicle body: 5,200
- Production Rate: 126 jobs per hour
- Annual Operation: 8,760 hours per year
- Electrode Weight (New): 0.9 ounces
- Electrode Weight (At replacement): 0.8 ounces
- Electrode Lifetime: Approximately 10,000 welds

<u>Potential to Emit Calculation:</u>

Annual Production: 126 jobs/hr x 8,760 hrs/year = 1,103,760 vehicles/year
No. of welds: 5,200 welds/veh x 1,103,760 veh/year = 5,739,552,000 welds/year
Electrode Tip Use: 5,739,552,000 welds/yr ÷ 10,000 welds/electrode = 573,995.2 electrodes/yr
Electrode Consumption: 0.9 oz/electrode – 0.8 oz/electrode = 0.07 lb/electrode
Electrode Loss: 0.07 lb/electrode x 573,955.2 electrodes/yr = 40,356.2 lbs electrode/yr
Emission Factor: 10.1 lb PM/1,000 lb electrode (AP-42 Table 12.19.1)
PM Emissions: 10.1 lb PM/1,000 lb/electrod x 40.1 1,000 lb/electrode/yr = 407.6 lb PM/yr
407.6 lb PM/year = 0.20 tons PM/year
Hourly Emissions: 0.2 tons PM/year x 2000 lb/ton ÷ 8760 hrs/year = 0.05 lb PM/hr

<u>Conclusion:</u>

0.05 lb PM/hr is below the 0.5 lb/hr exemption level for 10 CSR 10-6.400, therefore this rule does not apply to the welding operations at this facility.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1) The specific pollutant regulated by that rule is not emitted by the installation;
2) The installation is not in the source category regulated by that rule;
3) The installation is not in the county or specific area that is regulated under the authority of that rule;
4) The installation does not contain the type of emission unit which is regulated by that rule;
5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

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Environmental Engineer

Response to Public Comments

The draft Part 70 Operating Permit Ford Motor Company – Kansas City Plant (047-0019) was placed on public notice as of September, 2014 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm. On September 22, 2014 the Air Pollution Control Program received comments via e-mail from Mark Smith, EPA Region 7. Comments were also received from Rob Straight via e-mail on September 17, 2014 The comments are addressed below.

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Comments received from Mark Smith, EPA Region 7

Comment #1: Superseding Conditions within Permit Condition PW001 appears to be more informational than a permit requirement and EPA would suggest inclusion in the Statement of Basis in lieu of an applicable requirement in Permit Condition PW001. Also, condition 22 (increase of the PAL during the Effective Period) and condition 25 (Reporting Requirement) both appear to apply only to VOC. However, permit condition PW001 (PAL) is written to address VOC, PM_{10}, $PM_{2.5}$, NO_x, SO_x and CO. It would appear that requirements associated with an increase of the PAL during the effective period and the reporting requirements would apply to all the pollutants and not just VOC and EPA suggests MDNR include additional clarification.
Response to Comment: Since it is explained in the statement of basis that the conditions in PAL permit 042008-001 supersede all special conditions found in the previously issued construction permits and that the conditions in PAL permit 072001-009 supersede special condition 23 and 24A from permit 112000-014A, condition 1 was removed from Plantwide Permit Condition 001.

In condition 22, the statement, "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 VOC," has been changed to: "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(s)*. Likewise condition 25.B.3 has been changed from, "A summary of all data relied upon, including but not limited to, any Quality Assurance or Quality Control data, in calculating the monthly and annual VOC emissions," to: "A summary of all data relied upon, including but not limited to, any Quality Assurance or Quality Control data, in calculating the monthly and annual *pollutant emissions*."

Comment #2: Permit Condition PW001 identifies Ford Motor Company Kansas City Assembly Plant as the party responsible for compliance with the applicable permit conditions. All of the other permit conditions, in the draft operating permit, identify a mix of responsibilities including: permittee; owner or operator; and person. For consistency and in keeping with MDNR's customary practice, EPA recommends MDNR use "permittee" to recognize the compliance responsibility.
Response to Comment: Efforts have been made to change references to "Ford Motor Company Kansas City Plant," "owner/operator" or "person" to "the permittee" when appropriate within the operating permit.

Comment #3: Each of the permit conditions that incorporate applicable requirements for the Maximum Achievable Control Technology (MACT) standards include the "subject to this subpart" in various

places. EPA recommends that the specific subpart be identified, thereby removing any uncertainty and potential for confusion.
Response to Comment: This change has been made within the permit as recommended.

Comment #4: Record keeping and reporting requirement #1, in permit condition 009, requires submittal to the Administrator and EPA suggests that the Director may be the more appropriate named individual to receive the reports.
Response to Comment: The permit condition has been corrected to require reporting to the Director, rather than the Administrator.

Comment #5: Permit condition 013 provides a Tier 2 Emission Standard for > 750 HP Non-Road CI Engines table of emission factors. However, permit condition 013 is written to address the applicable requirements associated with unit EU0410: Fire Pump #5 and Fire Pump #6. Both of these fire pumps shown are 350 hp, therefore, EPA questions why emission factors for > 750 HP engines are included for 350 hp pumps.
Response to Comment: Permit Condition 013 of the draft operating permit has been corrected to include the requirements for emergency fire pump engines with maximum engine power 300≤HP≤600. The emissions limitations that are applicable from table 4 of Subpart IIII have been included.

Comment #6: The last sentence in the second paragraph of the Greenhouse Gas Emissions discussion in the Statement of Basis, only applies to coal-fired electric steam generating units. A more appropriate reference for emission data is http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html. EPA suggests MDNR modify the GHG emission information location reference.
Response to Comment: The reference has been updated in the Statement of Basis.

Comments received from Rob Straight, Ford Motor Company

Comment #1: The description currently identifies Ford as a major source of all criteria pollutants; however, the facility is limited to 55.5 tons per year of Sulfur Oxides (SO_x). Therefore, the facility is not a major source of SO_x. Additionally, the facility is not a major source of lead. As such, Ford requests that this statement be revised to state that Ford is a major source of all criteria pollutants except SO_x and lead.
Response to Comment: This correction has been made to the facility description.

Comment #2: Permit Condition PW001, Condition 14A - The condition currently reads that Ford "shall determine the VOC and HAP destruction and/or removal efficiencies and operating parameters of these control devices when all the processes controlled by these devices are in normal operation." To clarify, Ford utilizes the VOC destruction and/or removal efficiency values for both VOC and HAP emission calculations where required. While the permit does not spell out methodologies for either VOC or HAP in this condition, Ford wishes to clarify that VOC destruction and removal efficiency test results will be used for both VOC and HAP emission calculations when required. (Note that Ford complies with the Auto MACT (40 CFR Part 63, Subpart IIII) without the use of any add-on emission control equipment.)
Response to Comment: The following was added to the permit condition to make the clarifications requested: (Note: VOC destruction and removal efficiency test results will be used for both VOC and HAP emission calculations when required)

Comment #3: Permit Condition PW001, Condition 28A – There is a typo: "applied coating solvents" should be "applied coating solids."
Response to Comment: This typo has been corrected.

Comment #4: Permit Condition PW001, Condition 29A – Ford no longer utilizes blueprint machines to produce drawings. For requests that this condition be revised to state "Ford Motor Company shall maintain blueprints (or equivalent) showing rooftop locations of al exhaust stacks for both existing and new stacks."
Response to Comment: This change has been made as requested.

Comment #5: The Passenger and Commercial Body Shop Welding and Grinding operations (EP-42 for Passenger and EP-60 for Commercial) are not coating operations and are not subject to 10 CSR 10-6.075 or 40 CFR Part 63, Subpart IIII. These two operations should be removed from this condition. (Note that the Body Shop Sealer Operations remain.)
Response to Comment: The Passenger and Commercial Body Shop Welding and Grinding Operations were removed from the list of emission units subject to Permit Condition 001.

Comment #6: Additionally, some of the Emission Points identified in this table for Permit Condition 001 are incorrect. The following Emission Points should be corrected:

- Passenger Guidecoat Purge and Cleaning Emission Point should be EP-54.
- Passenger Topcoat Purge and Cleaning Emission Point should also be EP-54.
- Passenger Windshield Glass Install Emission Point is missing. It should be EP-55.
- Commercial Body Shop Sealer Operation Emission Point should be EP-56.
- Commercial Guidecoat Purge and Cleaning Emission Point should be EP-57.
- Commercial Topcoat Purge and Cleaning Emission Point should also be EP-57.
- Passenger Windshield Glass Install Emission Point should be EP-58.

Response to Comment: These emission points have been corrected in the table for Permit Condition 001.

Comment #7: Permit Condition 002 - Similar to the comment above, the Emission Points for Passenger Guidecoat Purge and Cleaning, Passenger Topcoat Purge and Cleaning, Commercial Guidecoat Purge and Cleaning, and Commercial Topcoat Purge and Cleaning should be revised as indicated above.
Response to Comment: These emission points have been corrected in the table for Permit Condition 002.

Comment #8: Permit Condition 004 - The Passenger Topcoat Booth Emission Point is missing. EP-09 should be added to the table. All references to both Passenger and Commercial Purge and Cleaning and Passenger and Commercial Spot Repair should be removed from the table as those are not stand-alone operations with emission control equipment subject to CAM.
Response to Comment: These changes were made to the table for Permit Condition 004.

Comment #9: Permit Condition 005 - All references to both Passenger and Commercial Purge and Cleaning should be removed from the table as those operations do not generate particulate matter emissions.
Response to Comment: The emission points have been removed from the table for Permit Condition 005 as requested.

Comment #10: Permit Condition 009 - The Emission Point for the Miscellaneous Boilers and Process Heaters subject to Boiler MACT is missing. Emission Point EP-62 should be added to cover the second set of boilers identified as subject to Boiler MACT.
Response to Comment: The emission point was added to the description of EU0400 in the table for Permit Condition 009.

Comment #11: Permit Condition 009 - Operational Limitation (3) is incorrect. Boiler tune-ups are required either annually, biennially, or every 5 years based on the boiler size. The condition references "annual" tune-ups only. The word "annual" should be deleted from the condition. The rest of the condition accurately reflects the varying tune-up schedule based on the requirements of 40 CFR 63.7540.
Response to Comment: The word "annual" as removed from condition 3 (operational limitations) of this permit condition.

Comment #12: Permit Condition 011 - The compliance date for natural gas-fired RICE is October 19, 2013 and should be included as part of Emission Limitations (2) along with the date for the diesel-fired RICE of May 3, 2013.
Response to Comment: Because the compliance dates have already passed they were removed from the permit condition.