

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
PERMIT**

**AND PREVENTION OF SIGNIFICANT  
DETERIORATION AUTHORITY  
TO CONSTRUCT AIR EMISSIONS EQUIPMENT  
THIS CERTIFIES THAT**

Nissan North America, Inc.  
300 Nissan Drive  
Canton, Mississippi  
Madison County

has been granted permission to construct air emissions equipment to comply with emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder and under authority granted by the Environmental Protection Agency under 40 CFR 52.01 and 52.21.

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

  
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**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued/Modified: January 14, 2015

Permit No.: 1720-00073

**Part I**

**A. GENERAL CONDITIONS**

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)
2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)
3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)
4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)
5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)
6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)
7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)
8. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)
9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)
11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)
12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.1.10, "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)
13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)
14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:
  - (a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and
  - (b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions. (Ref.: Miss. Code Ann. 49-17-21)
15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:
  - (a) Persistent violation of any of the terms or conditions of this permit;
  - (b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
  - (c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

16. **Public Record and Confidential Information:** Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)
17. **Permit Transfer:** This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B.)
18. **Severability:** The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)
19. **Permit Expiration:** The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)
20. **Certification of Construction:** A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)
21. **Beginning Operation:** Except as prohibited in Part I, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)
22. **Application for a Permit to Operate:** Except as otherwise specified in Part I, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)
23. **Operating Under a Permit to Construct:** Except as otherwise specified in Part I, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)
24. **Application Requirements for a Permit to Operate for Moderate Modifications:** For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to “net” out of PSD/NSR, the applicable Title V Permit to

Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. Compliance Testing: Regarding compliance testing:

- (a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.
- (b) Compliance testing will be performed at the expense of the permittee.
- (c) Each emission sampling and analysis report shall include but not be limited to the following:
  - (1) detailed description of testing procedures;
  - (2) sample calculation(s);
  - (3) results; and
  - (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), & (6).)

**B. GENERAL NOTIFICATION REQUIREMENTS**

- 1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)
- 2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)
- 3. Upon the completion of construction or installation of an approved stationary source or modification, the applicant shall notify the Permit Board that construction or installation was performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)
- 4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with “as built” plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an “as built” application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

**PART II  
 EMISSION POINT DESCRIPTION**

The permittee is authorized to construct and/or modify air emissions equipment for the emission of air contaminants from the following emission points:

Emission Point	Description
AA-000	System 1 Automobile and Light Duty Truck Manufacturing Facility
AA-013 (Ref. S1-10)	System 1 Paint Plant - Topcoat Line #1 and Purge Operation
AA-013a (Ref. S1-10)	System 1 Paint Plant - Topcoat Line #1 The VOC and VOHAP emissions from the Topcoat Line ovens and Clearcoat automatic zones are being routed through a two-burner Regenerative Thermal Oxidizer (S1-18 and S1-19), which exhausts through a single stack (Emission Point AA-021, which also controls emissions from the E-coat oven and the Primer Oven.) Particulate Matter is controlled with a wet scrubber water wash downdraft system.
AA-013b (Ref. S1-10)	System 1 Paint Plant - Purge Operation The clear-coat Purge Operation emissions are routed through the Regenerative Thermal Oxidizer (RTO) (Emission Point AA-021). A purge collection system is used to collect spent clearcoat purge solvent.
AA-021 (Ref. S1-18 & S1-19)	A two burner Regenerative Thermal Oxidizer (RTO) that exhausts through a single stack. The RTO combusts VOC and VOHAP emissions from the E-coat oven, Primer oven, the Topcoat ovens, and the automatic zones of the clearcoat operations. The fuel is natural gas and the burner rating for each RTO is 8.90 MMBTU/Hr.
AA-032	System 1 Combustion Equipment
AA-032as2	Color #1 Oven Zone 5 equipped with a 4.5 MMBTU/Hr natural gas fired burner.
AA-024	System 1 Plastics Plant - Fascia Coating Line and Purge Operation

Emission Point	Description
<p style="text-align: center;"><b>AA-024a</b> (Ref. P1-02)</p>	<p><b>System 1 Plastics Plant - Fascia Coating Line. The VOC and HAP emissions from the Fascia Coating Line oven is routed through a Regenerative Thermal Oxidizer (RTO) (Emission Point AA-026). Particulate Matter is controlled with a wet scrubber water-wash downdraft system.</b></p>
<p style="text-align: center;"><b>AA-024b</b> (Ref. P1-02)</p>	<p><b>System 1 Plastics Plant - Purge Operation A purge collection system is used to collect spent purge solvent.</b></p>
<p style="text-align: center;"><b>AA-026</b> (Ref. P1-04)</p>	<p><b>System 1 Plastics Plant - Fascia Regenerative Thermal Oxidizer (RTO) controlling VOC and VOHAP emissions from the oven. The fuel is natural gas and burner rating for the RTO is 0.96 MMBTU/Hr.</b></p>
<p style="text-align: center;"><b>AB-000</b></p>	<p><b>System 2 Automobile and Light Duty Truck Manufacturing Facility.</b></p>
<p style="text-align: center;"><b>AB-024</b></p>	<p><b>System 2 Plastics Plant - Fascia Coating Line and Purge Operation</b></p>
<p style="text-align: center;"><b>AB-024a</b> (Ref. P2-02)</p>	<p><b>System 2 Plastics Plant - Fascia Coating Line. The Fascia Coating Line oven VOC and HAP emissions are routed through a Regenerative Thermal Oxidizer (RTO) (Emission Point AB-026). Particulate Matter is controlled with a wet scrubber water-wash downdraft system.</b></p>
<p style="text-align: center;"><b>AB-024b</b> (Ref. P2-02)</p>	<p><b>System 2 Plastics Plant - Purge Operation. A purge collection system is used to collect spent purge solvent.</b></p>
<p style="text-align: center;"><b>AB-026</b> (Ref. P2-03)</p>	<p><b>System 2 Plastics Plant - Fascia Regenerative Thermal Oxidizer (RTO) controlling VOC and VOHAP emissions from the oven. The fuel is natural gas and burner rating for the RTO is 1.00 MMBTU/Hr.</b></p>
<p style="text-align: center;"><b>AC-000</b></p>	<p><b>System 1 and 2 Miscellaneous Operations</b></p>
<p style="text-align: center;"><b>AD-000</b></p>	<p><b>System 3 Automobile and Light Duty Truck Manufacturing Facility</b></p>

**PART III**  
**EMISSION POINT SPECIFIC LIMITATIONS AND STANDARDS**

Emission Point	Applicable Standard	Condition Number	Pollutant/Parameter	Limit/Standard
AA-000, AB-000, AC-000 and AD-000 (Entire Facility)	PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-024, AB-024 and AA-013)	III.1	Production Limit	System 1 and System 3 combined is limited to 300,000 vehicles per year.
				System 1, System 2, and System 3 combined is limited to 500,000 vehicles per year.
		III.2	VOC	System 1 and System 3 combined is limited to 2,082.83 TPY
				System 1, System 2, and System 3 combined is limited to 3,358.15 TPY
AA-000, AB-000, AC-000 and AD-000 (Entire Facility)	PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), January 14, 2015 (AA-024, AB-024 and AA-013), and 40 CFR 60, Method 9	III.3	Opacity	Not greater than 10%
AA-000, AB-000, AC-000 and AD-000 (Entire Facility)	EPA/Auto Protocol (EPA -450/3-88-018)	III.4	VOC BACT Limit(s) Compliance Methodology	Transfer Efficiencies, Booth/Oven Splits, and Capture Efficiencies for Compliance
AA-000, AB-000, AC-000 and AD-000 (Entire Facility)	PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-024, AB-024 and AA-013)	III.5	Performance Testing	Pretest Conference at least 30 days prior to scheduled date for all required performance test
AA-021, AA-026 and AB-026 (System 1 Paint Plant and System 1 and 2 Fascia Plant RTO's)	PSD Construction Permit issued May 14, 2003, and January 14, 2015	III.6	Fuel Usage	BACT is the use of natural gas as fuel.
		III.7	Biennial Performance Testing	Performance Testing to Ensure 95% Destruction Efficiency



Emission Point	Applicable Standard	Condition Number	Pollutant/Parameter	Limit/Standard
AA-024 and AB-024 (System 1 and System 2 Fascia Plastic Plants)	PSD Construction Permit issued May 14, 2003, and January 14, 2015 (primer-waterborne to solventborne)	III.8	VOC	BACT for VOC is the use of good work practices, solventborne primers, solventborne basecoats, and solventborne clearcoats with the fascia oven exhaust routed to the RTO with a minimum destruction efficiency of 95%.
AA-024a and AB-024a (System 1 and System 2 Fascia Plastic Plant Coating Lines)	PSD Construction Permit issued April 2, 2001, May 14, 2003, and January 14, 2015 (Primer BACT Limit)	III.9	VOC BACT	6.3lb/gal for the primer, 4.3lb/gal for the basecoat, and 4.0lb/gal for the clearcoat. (Based on a monthly average of all coatings)
	PSD Construction Permit issued January 14, 2015 (Change from Case-by-Case to Subpart PPPP 40 CFR 63.4490(b)(3), 40 CFR 63.4492(b), and 40 CFR 63.4493(b))	III.10	HAPs	40 CFR 63, Subpart PPPP: 0.26 lbHAP/lb applied coating solids (acs) (Based on monthly average) and continued implementation of its existing Good Work Practice Plan consistent with 40 CFR 63.4493(b) and existing Operating Plan Provisions consistent with Table 1 (Conditions IV.12 and IV.14)
AA-024b and AB-024b (System 1 and System 2 Fascia Plastic Plant Purge Operations)	PSD Construction Permit issued April 2, 2001, May 14, 2003, and January 14, 2015 (case-by-case to Subpart PPPP MACT applicability)	III.11	VOC BACT	BACT is the use of good work practices, implementation of its existing work practice plan (consistent with the requirements of Subpart PPPP) and the continued operation of the purge solvent recovery system
AA-024 (System 1 Fascia Plastic Plants)	PSD Construction Permit issued April 2 2001, May 14, 2003, December 1, 2005, and January 14, 2015 (no increase)	III.12	PM BACT (filterable and condensable)	1.38 TPY
AA-024 and AB-024	PSD Construction Permit issued April 2,	III.13	PM BACT (filterable)	System 1, System 2, and System 3 combined is limited

Emission Point	Applicable Standard	Condition Number	Pollutant/Parameter	Limit/Standard
<p><i>(System 1 and System 2 Fascia Plastic Plants)</i></p>	<p>2001, May 14, 2003, December 1, 2005, and January 14, 2015</p>		<p>and condensable)</p>	<p>to 2.41 TPY</p>
		<p>III.14</p>	<p>PM Controls</p>	<p>BACT for PM is the use of wet scrubbers in the form of downdraft waterwash system for control in the high volume continuous coating lines.</p>
<p>AA-013 <i>(System 1 Topcoat Operations)</i></p>	<p>40 CFR 60, Subpart A</p>	<p>III.15</p>	<p>General</p>	<p>General Provisions for New Source Performance Standards</p>
	<p>40 CFR 60, Subpart MM and 40 CFR 60.393(b)</p>	<p>III.16</p>	<p>Applicability and Requirements</p>	<p>Continued Compliance with NSPS for the Automobile and Light Duty Truck Surface Coating Operations and Monthly Testing for Subpart MM</p>
	<p>40 CFR 60.393(c)(2)</p>	<p>III.17</p>	<p>Performance Testing</p>	<p>Continued Compliance Provisions for Subpart MM</p>
<p>AA-013 <i>(System 1 Topcoat Operations)</i></p>	<p>PSD Construction Permit issued May 14, 2003, and January 14, 2015</p>	<p>III.18</p>	<p>RTO Controls</p>	<p>BACT for VOC and MACT for HAPs has been determined to be the use of waterborne basecoat and solventborne clearcoat with the clearcoat booth automatic and the topcoat oven exhaust routed through an RTO with a minimum destruction efficiency of 95%.</p>
	<p>PSD Construction Permit issued May 14, 2003, and January 14, 2015</p>	<p>III.19</p>	<p>PM Controls</p>	<p>Use of wet scrubbers in the form of downdraft waterwash system for control of particulate emissions from the high volume continuous coating lines. (PM BACT for AA-013 and AB-013)</p>
<p>AA-013 and AD-013 <i>(System 1 Topcoat)</i></p>	<p>PSD Construction Permit issued May 14, 2003, December 1,</p>	<p>III.20</p>	<p>PM BACT (filterable and</p>	<p>System 1 and System 3 combined limit of 6.30 TPY</p>

<b>Emission Point</b>	<b>Applicable Standard</b>	<b>Condition Number</b>	<b>Pollutant/Parameter</b>	<b>Limit/Standard</b>
<i>Operations)</i>	2005, and January 14, 2015		condensable)	
<b>AA-013, AB-013, and AD-013</b> <i>(System 1, 2, and 3 Topcoat Operations)</i>		III.21	PM BACT (filterable and condensable)	System 1, System 2, and System 3 combined limit of 7.75 TPY
<b>AA-013a</b> <i>(System 1 and Topcoat)</i>	PSD Construction Permit issued May 14, 2003 and January 14, 2015	III.22	HAPs	112(g) Case-by-Case MACT: Combined weighted average limit of 0.9 lbHAP/GACS.
	PSD Construction Permit issued May 14, 2003, December 1, 2005, and January 14, 2015	III.23	VOC BACT	5.2 lb/GACS.
<b>AA-013b</b> <i>(System 1 Purge Operations)</i>	PSD Construction Permit issued April 2, 2001, and January 14, 2015	III.24	VOC BACT	BACT and MACT has been determined to be the use of good work practices, implementation of its existing work practice plan, and the continued use of the purge solvent recovery system to minimize purge solvent emissions.
			HAPs	
<b>AA-032</b> <i>(System 1 Combustion Equipment)</i>	PSD Construction Permit issued May 14, 2003, and January 14, 2015	III.25	PM BACT (filterable and condensable), SO <sub>2</sub> BACT, CO BACT, VOC BACT, and HAPs	Combustion of Natural Gas Only
		III.26	NO <sub>x</sub> BACT	0.1 lb/MMBTU and Combustion of Natural Gas Only
<b>AA-032as2</b> <i>(System 1 Topcoat Zone 5 Oven)</i>	PSD Construction Permit issued January 14, 2015	III.27	Fuel Usage	Combustion of Natural Gas Only

- III.1 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall limit the production of vehicles to 300,000 for System 1 (AA-000) and System 3 (AD-000) combined and 500,000 for System 1, System 2 (AB-000), and System 3 combined as determined for each calendar year. (Ref.: PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024))
- III.2 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall not discharge emissions of Volatile Organic Compounds (VOC's) in excess of 2,082.83 tons per year (TPY) for System 1 (AA-000) and System 3 (AD-000) combined and 3,358.15 tons per year (TPY) for System 1, System 2 (AB-000), and System 3 combined, as determined for each consecutive twelve month period. (Ref.: PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024))
- III.3 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall not cause emissions of Opacity to exceed 10% at any time as determined by EPA Test Method 9, 40 CFR 60, Appendix A. (Ref.: PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024) and 40 CFR 60, Method 9))
- III.4 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall comply with the VOC BACT Limits by utilizing the EPA/Auto Protocol for Transfer Efficiencies, Booth/Oven Splits, and Capture Efficiencies. (Ref.: EPA Document A Protocol - 450/3-88-018)
- III.5 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall submit a request to the MDEQ for a Pretest Conference to be held 30 days prior to the scheduled date for all required performance testing. (Ref.: PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024))
- III.6 For Emission Points AA-026 and AB-026, the permittee shall utilize natural gas fuel only (BACT for Fuel Usage). (Ref.: PSD Construction Permit issued May 14, 2003, and January 14, 2015 (AA-026 and AB-026))
- III.7 For Emission Points AA-021, AA-026 and AB-026, the permittee shall continue to perform biennial performance testing to ensure that the Regenerative Thermal Oxidizer (RTO) is operating at 95% or greater destruction efficiency. (Ref.: PSD Construction Permit issued May 14, 2003, and January 14, 2015 (AA-021, AA-026 and AB-026))
- III.8 For Emission Points AA-024 and AB-024, the permittee shall use solventborne primers, solventborne basecoats, and solventborne clearcoats with the fascia oven exhaust routed through a Regenerative Thermal Oxidizer (RTO) with a minimum destruction efficiency of 95% (BACT for VOCs and Subpart PPPP MACT for HAPs). (Ref.: PSD Construction Permit issued May 14, 2003, and January 14, 2015 (waterborne to solventborne primer material))
- III.9 For Emission Points AA-024a and AB-024a, the permittee shall not discharge emissions of Volatile Organic Compounds (VOCs) in excess of 6.3 lbs/gallon for the primer, 4.3

lbs/gallon for the basecoat, and 4.0 lbs/gallon for the clearcoat, as determined by a monthly average of all coatings. (BACT for VOCs). (Ref.: PSD Construction Permit issued April 2, 2001, May 14, 2003, and January 14, 2015 (primer BACT limit))

- III.10 For Emission Point AA-024a and AB-024b, the permittee shall not discharge emissions of Hazardous Air Pollutants (HAPs) in excess of 0.26 pound (lb) per pound coating solids used during each 12-month compliance period. (Subpart PPPP MACT for HAPs). The permittee shall also continue the implementation of its existing Work Practice Plan consistent with the work practice plan requirements of 40 CFR 63.4493(b)(3)) (Ref.: PSD Construction Permit issued May 14, 2003 and (40 CFR 63.4490(b)(3) and 63.4493(b) - January 14, 2015 (case-by-case to Subpart PPPP MACT))
- III.11 For Emission Points AA-024b and AB-024b, the permittee shall utilize good work practices and continue to implement its existing work practice plan in addition to the operation of its purge solvent recovery system to minimize purge solvent emissions (BACT for VOCs and Subpart PPPP MACT for HAPs). The permittee shall maintain a work practice plan that includes at a minimum one or more of the following techniques:
- (a) Air/Solvent push-out.
  - (b) Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
  - (c) Block painting to the maximum extent feasible.
  - (d) Use of low-HAP or no-HAP solvents for purge.
- (Ref.: PSD Construction Permit issued April 2, 2001, May 14, 2003, and January 14, 2015 (case-by-case to Subpart PPPP MACT for HAPs applicability))
- III.12 For Emission Point AA-024, the permittee shall not discharge emissions of Particulate Matter (PM) in excess of 1.38 tons per year (BACT for PM) as determined for each 12 month consecutive period. (Ref.: PSD Construction Permit issued December 1, 2005, and January 14, 2015 (no change to limit))
- III.13 For Emission Points AA-024 and AB-024, the permittee shall not discharge combined emissions of Particulate Matter in excess of 2.41 tons per year (BACT for PM) as determined for each consecutive 12 month period. (Ref.: PSD Construction Permit issued December 1, 2005, and January 14, 2015 (no change to limit))
- III.14 For Emission Points AA-024 and AB-024, the permittee shall use wet scrubbers in the form of a downdraft waterwash system for control of Particulate Matter (PM) emissions from the high volume continuous coating lines (BACT for PM). (Ref.: PSD Construction Permit issued May 14, 2003, and January 14, 2015 (waterborne to solventborne primer))
- III.15 For Emission Point AA-013, the permittee is subject to and shall continue to comply with 40 CFR 60, Subpart A, New Source Performance Standards General Provisions. (Ref.: 40 CFR 60, Subpart A)

- III.16 For Emission Point AA-013, the permittee is subject to 40 CFR 60, Subpart MM, New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations and shall conduct monthly performance test in accordance with 40 CFR 60.8. (Ref.: 40 CFR 60, Subpart MM)
- III.17 For Emission Point AA-013, the permittee shall use the following procedures for each affected unit which uses a capture system and a control devices that destroys VOC to comply with the applicable emission limit specified in Conditions 3.B.23 and whose term definitions can be found in Appendix E:

(a) Calculate the volume weighted average mass of VOC per volume of applied coating solids for each calendar month. The permittee shall determine the composition of the coating by formulation of the data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by Method 24. The DEQ may require the permittee which uses formulation of data supplied by the manufacturer of the coating to determine data used in the calculation of the VOC content of coating 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 use each calendar month will be determined by the following procedures.

- (1) 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:

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

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

- (2) 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:

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

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

Application Method	Transfer Efficiency
Air Atomized Spray (waterborne coating)	0.39
Air Atomized Spray (solvent-borne coating)	0.5
Manual Electrostatic Spray	0.75
Automatic Electrostatic Spray	0.95
Electrodeposition	1

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 DEQ's satisfaction that other values for transfer efficiencies are appropriate, the DEQ 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 of coatings used and "p" is the total number of application methods:

$$T = \sum_{i=1}^n TlVsiLcil / \sum_{i=1}^p Ls$$

- (3) Calculate the volume weighted average mass of VOC per volume of applied coating solids (G) during each calendar month using the following equation:

$$G = \frac{Mo + Md}{LsT}$$

- (4) For each EDP prime coat operation, calculate the turnover ratio (RT) by the following equation:

$$RT = \frac{Ls}{LE}, \text{ truncated after 3 decimal places.}$$

Then calculate or select the appropriate limit according to Condition 3.B.16.

- (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 Condition 3.B.23, the permittee is in compliance. Each monthly calculation is a performance test for the purpose of this subpart.
- (c) Calculate the volume weighted average mass of VOC per volume of applied solids emitted after the control device, by the following equation:  $N=G[1-FE]$ 
  - (1) Determine the fraction of total VOC which is emitted by the permittee that enters the control device by using the following equation where “n” is the total number of stacks entering the control device and “p” is the total number of stacks not connected to the control device:

$$\sum_{i=1}^p$$

If the permittee can justify to the DEQ’s satisfaction that another method will give comparable results, the DEQ will approve its use on a case-by-case basis.

- (i) In subsequent months, the permittee shall use the most recently determined capture fraction for the performance test.
- (2) Determines the destruction efficiency of the control device using values of the volumetric flow rate of the gas streams and the VOC (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:



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

- (i) In subsequent months, the permittee shall use the most recently determined VOC destruction efficiency for the performance test.
  - (3) If an emission control device controls the emissions from more than one unit, 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 unit served by the control device.
  - (d) 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 Conditions 3.B.23, the unit is in compliance. Each monthly calculation is a performance test for the purposes of this subpart.  
(Ref.: 40 CFR 60.393(c)(2))
- III.18 For Emission Point AA-013, the permittee shall utilize waterborne basecoats and solventborne clearcoats with the clearcoat booth (automatic) and the topcoat oven exhaust routed through a Regenerative Thermal Oxidizer (RTO) (Emission Point AA-021) with a minimum destruction efficiency of 95% (BACT for VOCs and Case-by-Case MACT for HAPs). (Ref.: PSD Construction Permit issued May 14, 2003, and January 14, 2015)
- III.19 For Emission Point AA-013, the permittee shall use wet scrubbers in the form of a downdraft waterwash system for control of particulate matter emissions from the high volume continuous coating lines (PM BACT for AA-013). (Ref.: PSD Construction Permit issued May 14, 2003 and January 14, 2015 (no change to limit))
- III.20 For Emission Point AA-013, the permittee has a combined limit with AD-013 (System 3 Topcoat Operations) of 6.30 tons per year of Particulate Matter (PM BACT for AA-013) as determined for each consecutive 12 month period. (Ref.: PSD Construction Permit issued December 1, 2005, June 26, 2009 (AD-013), and January 14, 2015 (no change to limit))
- III.21 For Emission Points AA-013, the permittee has a combined limit with AB-013 and AD-013 (System 2 and 3 Topcoat Operations) of 7.75 tons per year of Particulate Matter as determined for each consecutive 12 month period (PM BACT for AA-013 and AB-013). (Ref.: PSD Construction Permit issued December 1, 2005, June 26, 2009 (AD-013), and January 14, 2015 (no change to limit))
- III.22 For Emission Point AA-013, the permittee shall not discharge emissions of Hazardous Air Pollutants in excess of 0.9 lbHAP/GACS (Case-by-Case MACT for HAPs). (Ref.: PSD Construction Permit issued May 14, 2003, and January 14, 2015)

- III.23 For Emission Point AA-013, the permittee shall not discharge emissions of Volatile Organic Compounds (VOCs) in excess of 5.2 lb/GACS. (PSD Construction Permit issued May 14, 2003, December 1, 2005, June 26, 2009 (AD-013a), January 14, 2015, and 40 CFR 60, Subpart MM)
- III.24 For Emission Point AA-013, the permittee shall utilize good work practices and continue to implement its existing work practice plan in addition to the operation of its purge solvent recovery system to minimize purge solvent emissions (BACT for VOCs and Case-by-Case MACT for HAPs). The permittee shall maintain a work practice plan that includes at a minimum one or more of the following techniques:
- (a) Air/Solvent push-out.
  - (b) Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
  - (c) Block painting to the maximum extent feasible.
- (Ref.: PSD Construction Permit issued April 2, 2001 and January 14, 2015)
- III.25 For Emission Point AA-032, the permittee shall combust natural gas fuel only (BACT for PM, SO<sub>2</sub>, CO, VOCs and MACT for HAPs). (Ref.: PSD Construction Permit issued May 13, 2003, June 26, 2009 (AD-032) and January 14, 2015)
- III.26 For Emission Point AA-032, the permittee shall not discharge emissions of Nitrogen Oxides in excess of 0.1 lb/MMBTU (BACT for NO<sub>x</sub>). (Ref.: PSD Construction Permit issued May 13, 2003, June 26, 2009 (AD-032) and January 14, 2015)
- III.27 For Emission Point AA-032as2, the permittee shall combust natural gas fuel only. (Ref.: PSD Construction Permit issued January 14, 2015)

PART IV  
EMISSION POINT SPECIFIC MONITORING AND RECORDKEEPING

Emission Point	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-000, AB-000, AC-000 and AD-000 (Entire Facility)	Production Limit	Monthly Recordkeeping of Production	IV.1	PSD Construction Permit (PSD) issued April 2, 2001, June 26, 2008 (AD-000) and January 14, 2015 (AA-013, AA- 024 and AB-024)
	VOC and HAP	Monthly Recordkeeping of Quality and Quantity of all VOC and HAP containing material used	IV.2	PSD Construction Permit issued April 2, 2001, December 1, 2005, June 26, 2008 (AD-000) and January 14, 2015 (AA-013, AA-024 and AB-024)
	MACT Limit Compliance	Monthly Recordkeeping of material HAP content determined by formulation data or analytical data (Method 311)	IV.3	
	Opacity	Monthly Recordkeeping of weekly VEM Observations	IV.4	
	Preventative Maintenance	Monthly Recordkeeping of Regular Maintenance	IV.5	
AA-013, AA-024 and AB-024 (System 1 Topcoat Operation and System 1 and 2 Fascia Plastic Plants)	Work Practices	Monthly Recordkeeping Certification of Good Work Practices and Continued Implementation of Work Practice Plan to minimize Clean-up/purge/general solvent and other solvent materials	IV.6	PSD Construction Permit issued April 2, 2001, December 1, 2005, and June 26, 2008 (AD-000) and January 14, 2015 (AA-013, AA-024 and AB-024)
	PM	Monthly Recordkeeping of PM Emissions	IV.7	PSD Construction Permit issued May 14, 2003 and January 14, 2015
	PM	Monthly Recordkeeping Certification of manufacturer operation of Wet Scrubbers	IV.8	
AA-024a and AB-024a (System 1 and System 2 Fascia Plastic Plant Coating Lines)	VOC and HAP	Monthly Recordkeeping of Quality and Quantity of all VOC and HAP containing material used	IV.9	PSD Construction Permit issued April 2, 2001, May 14, 2003, December 1, 2005, June 26, 2008 (AD- 005, AD-010a, and AD- 013a) and January 14, 2015 (AA-024a and AB- 024b)

Emission Point	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-021, AA-026 and AB-026 (System 1 Paint Plant and System 1 and 2 Fascia Plastic Plant RTO's)	Temperature	Monthly Recordkeeping of Continuously Recorded Combustion Temperature	IV.10	PSD Construction Permit issued May 14, 2003, June 26, 2008, January 14, 2015, and 40 CFR 60.394(a) for AA-013 only)
	RTO Control	Monthly Recordkeeping of the RTO Destruction Efficiency (DRE)	IV.11	PSD Construction Permit issued May 14, 2003, June 26, 2008, and January 14, 2015
	VOC Limit Compliance	Monthly Recordkeeping of material VOC content determined by formulation data or analytical data (Method 24)	IV.12	PSD Construction Permit issued May 14, 2003, June 26, 2008, January 14, 2015, and 40 CFR 60, Appendix A, EPA Reference Method 24 for AA-013 only)
	Temperature Measurement Device	Incinerator Monitoring	IV.13	PSD Construction Permit issued May 14, 2003, June 26, 2008, January 14, 2015, and 40 CFR 60.394(a) for AA-013 only)
AA-021, AA-026, AB-026, and (System 1 Paint Plant and System 1 and 2 Fascia Plastic Plant RTO's)	Fuel Usage	Monthly Recordkeeping of Fuel Quality and Quantity	IV.14	PSD Construction Permit issued May 14, 2003, June 26, 2008, and January 14, 2015
AA-024a and AB-024a (System 1 and System 2 Fascia Plastic Plants)	General	Recordkeeping Requirements (e.g., notifications, manufacturer data)	IV.15	40 CFR 63.4530(a, b, c(4), d, e, f, g, and h)
	Length and Form	Must Keep Records for Five Years (on-site for two)	IV.16	40 CFR 63.4531
	Performance Testing	Shall be consistent with existent requirements	IV.17	40 CFR 63.4560(c)

<b>Emission Point</b>	<b>Pollutant/ Parameter Monitored</b>	<b>Monitoring/Recordkeeping Requirement</b>	<b>Condition Number</b>	<b>Applicable Requirement</b>
<b>AA-024a and AB-024a (System 1 and System 2 Fascia Plastic Plants)</b>	<b>Initial and Continuous</b>	<b>Compliance Demonstration</b>	<b>IV.18</b>	<b>40 CFR 63.4561 and 40 CFR 63.4563</b>
	<b>Performance Tests</b>	<b>General Requirements</b>	<b>IV.19</b>	<b>40 CFR 63.4564</b>
	<b>Efficiency</b>	<b>Emission Capture System</b>	<b>IV.20</b>	<b>40 CFR 63.4565(b)</b>
	<b>DRE</b>	<b>Determining DRE consistent with existing method</b>	<b>IV.21</b>	<b>40 CFR 63.4566</b>
	<b>RTO</b>	<b>Operating Limits during Performance Tests</b>	<b>IV.22</b>	<b>40 CFR 63.4567(a)</b>
	<b>CPMS</b>	<b>Continuous Parameter Monitor System (CPMS) Requirements</b>	<b>IV.23</b>	<b>40 CFR 63.4568(c)(1) and (3)</b>
<b>AA-032as2 (System 1 Topcoat Zone 5 Oven)</b>	<b>Fuel Usage</b>	<b>Monthly Recordkeeping of Quality and Quantity</b>	<b>IV.24</b>	<b>PSD Construction Permit issued January 14, 2015</b>

- IV.1 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall monitor and maintain sufficient records to document the monthly vehicle production as determined on a calendar year basis for demonstrating compliance with Condition III.1 of the permit herein. (Ref.: PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000) and January 14, 2015 (AA-024 and AB-024)-(no change to condition requirements))
- IV.2 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall determine for each coating, adhesive, solvent or other Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) containing material used and maintain sufficient monthly records to document:
- (a) Quantity used (gal or lb)
  - (b) The percentage of VOC's and HAP's by weight
  - (c) The density (lbs/gal), unless material usages are measured in lbs
  - (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC and HAP content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
  - (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials each month and compare the VOC emissions to those allowed under conditions III.2 of the permit herein.
- (Ref.: PSD Construction Permit issued April 2, 2001, Title V Permit to Operate Issued August 2, 2004, PSD Construction Permit Issued December 1, 2005, June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024)-(no change to condition requirements))
- IV.3 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall perform and maintain sufficient monthly records of Hazardous Air Pollutants (HAPs) to demonstrate compliance utilizing formulation data or analytical data (Method 311). (Ref.: 40 CFR 60, Appendix A, Method 311, PSD Construction Permit issued April 2, 2001, Title V Permit to Operate Issued August 2, 2004, and PSD Construction Permit Issued January 14, 2015 (AD-000), and January 14, 2015 (AA-026 and AB-026))
- IV.4 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall perform and maintain sufficient records to document weekly Visual Emission Evaluations (VEEs/Observations) for demonstrating compliance with Condition III.3 of the permit herein. If visible emissions are observed from any stack, excluding uncombined water droplets, the permittee shall perform EPA Method 9 on that emission point for determining compliance with the aforementioned Condition. (Ref.: PSD Construction Permit issued April 2, 2001, PSD Construction Permit Issued June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024)-(no change to condition requirements))
- IV.5 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall perform and maintain sufficient monthly records to document preventative maintenance,

inspections of air pollution control equipment, and calibrations performed as necessary to maintain proper operation of equipment and monitoring devices. These records shall be kept in log form and made available for review upon request during any inspection visit by DEQ personnel. (Ref.: PSD Construction Permit issued April 2, 2001, PSD Construction Permit Issued June 26, 2008 (AD-000), and January 14, 2015 (AA-024 and AB-024)-(no change to condition requirements))

- IV.6 For Emission Points AA-013, AA-024 and AB-024, the permittee shall perform and maintain sufficient monthly records to document the use of Good Work Practices and Continued Implementation of its existing Good Work Practice Plan to minimize clean-up/purge/general solvent and other solvent containing materials. These records shall be in the form of the following Good Work Practice Certification Statement of the Title V Permit to Operate which may be developed by the Senior Environmental Manager for the facility and certified by the Responsible Official in the semi-annual report submittals:

"Based upon my inquiry of the person or persons directly responsible for managing compliance with the permit limitations described in Section III of the Title V Permit to Operate Issued on August 2, 2004 and timely reissued and/or modified, I certify that, to the best of my knowledge and belief, Good Work Practices and Continued Implementation of the existing Good Work Practice Plan have been utilized to minimize clean-up/purge/general solvent and other solvent containing material used. I further certify that this facility is maintaining sufficient records to demonstrate this upon a site inspection visit or request by any DEQ personnel."

(Ref.: PSD Construction Permit issued April 2, 2001, June 26, 2008 (AD-000), and January 14, 2015 (AA-013, AA-024 and AB-024)-(no change to condition requirements))

- IV.7 For Emission Points AA-013, AA-024 and AB-024, the permittee shall determine compliance with Particulate Matter (PM) emissions and maintain sufficient monthly records to document:
- (a) The permittee may utilize data supplied by the manufacturer, an approved EPA Test Method, an approved EPA AP-42 Emission Factor, or by utilizing the following Formula Calculation for analysis of emissions:  $PM \text{ Emissions (lbs/hr)} = \text{Paint Usage (gal/hr)} \times \text{Paint Density (lbs/gal)} \times \text{Solids Content (weight fraction)} \times (1 - \text{Transfer Efficiency in percent}/100) \times (1 - \text{Control Efficiency in percent}/100)$
  - (b) The permittee shall also calculate the PM emissions from the use of one or more of these methods each month and compare the emissions to those allowed under Conditions III.12 and III.13 of the permit herein.
  - (c) If the permittee chooses to comply with this requirement by utilizing the PM Formula Calculation, the permittee shall also maintain the following data to support these calculations:
    - (1) The type and quantity in gallons and weight in pounds of each coating material during each calendar month
    - (2) The density of coating (lbs/gal)

(3) The solids content (weight fraction)

(Ref.: PSD Construction Permit issued April 2, 2001, May 14, 2003, June 26, 2008, and January 14, 2015 (AA-013, AA-024 and AB-024) – (no change to condition requirements))

- IV.8 For Emission Points AA-013, AA-024 and AB-024, the permittee shall perform and maintain sufficient records to document the Wet Scrubber Maintenance to ensure that the Wet Scrubber is being operated in a manner consistent with vendor certification and manufacturer design and specifications. These records shall be in the form of the following Good Work Practice Certification Statement of the Title V Permit to Operate which may be developed by the Senior Environmental Manager for the facility and certified by the Responsible Official in the semi-annual report submittals:

"Based upon my inquiry of the person or persons directly responsible for managing compliance with the permit limitations described in Section III of the Title V Permit to Operate Issued on August 2, 2004 and timely reissued and/or modified, I certify that, to the best of my knowledge and belief, Preventative Maintenance of the control equipment is being performed in a manner consistent with vendor certification and manufacturer design and specifications. I further certify that this facility is maintaining sufficient records to demonstrate this upon a site inspection visit or request by any DEQ personnel."

(Ref.: PSD Construction Permit issued April 2, 2001, May 14, 2003, June 26, 2008, and January 14, 2015 (AA-013, AA-024 and AB-024) – (no change to condition requirements))

- IV.9 For Emission Points AA-024a and AB-024a, the permittee shall determine for each coating, adhesive, solvent or other Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) containing material used and maintain sufficient monthly records to document:

- (a) Quantity used (gal or lb)
- (b) The percentage of HAP's and VOC's by weight
- (c) The density (lbs/gal), unless material usages are measured in lbs
- (d) The permittee may utilize data supplied by the manufacturer, or analysis of HAP and VOC content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the HAP and VOC emissions from the use of these materials each month and compare the emissions to those allowed under Conditions III.12 and III.13 of the permit herein.

(Ref.: PSD Construction Permit issued April 2, 2001, May 14, 2003, December 1, 2005, June 26, 2008, and January 14, 2015 (AA-024a and AB-024b) – (no change to condition requirements))



- IV.10 For Emission Points AA-021, AA-026 and AB-026, in addition to those requirements of Condition IV.14 of the permit herein, the permittee shall continuously record the incinerator (RTO) combustion temperature during coating operations for determining compliance with the destruction efficiency required under Condition III.8 of the permit herein. (Ref.: PSD Construction Permit issued May 14, 2003, June 26, 2008, January 14, 2015 (AA-026 and AB-026)-(no change to condition requirements), and 40 CFR 60.394(a) for AA-013 only)
- IV.11 For Emission Points AA-021, AA-026 and AB-026, the permittee maintain sufficient monthly records to document the Regenerative Thermal Oxidizer (RTO) Destruction Efficiency for demonstrating compliance with Conditions III.8 of the permit herein. (Ref.: PSD Construction Permit issued May 14, 2003, June 26, 2008, and January 14, 2015 (AA-026 and AB-026)-(no change to condition requirements))
- IV.12 For Emission Point AA-021, AA-026 and AB-026, the permittee shall perform and maintain sufficient records to document the utilization of EPA Reference Method 24 for determining compliance with Condition III.10, of the permit herein. (Ref.: PSD Construction Permit issued May 14, 2003, June 26, 2008, January 14, 2015 (AA-026 and AB-026)-(no change to condition requirements), and 40 CFR 60, Appendix A, EPA Reference Method 24 for AA-013 only)
- IV.13 For Emission Point AA-021, AA-026 and AB-026, the permittee shall ensure that the installation of the temperature measurement device in the firebox is being maintained in such manner that all manufacturer recommendations are being followed and shall include any necessary routine calibrations to ensure that it operates at its optimum level. (Ref.: PSD Construction Permit issued May 14, 2003, June 26, 2008, January 14, 2015 (AA-026 and AB-026)-(no change to condition requirements) and 40 CFR 60.394(a) for AA-013 only)
- IV.14 For Emission Points AA-021, AA-026, and AB-026, the permittee shall monitor and maintain sufficient monthly records to document the Quality and Quantity of Fuel Combusted for compliance with Condition III.6 of the permit herein. (Ref.: PSD Construction Permit issued May 14, 2003, June 26, 2008, and January 14, 2015 (AA-026 and AB-026)-(no change to condition requirements) (AD-032as2))
- IV.15 For Emission Point AA-024a and AB-024b, the permittee shall comply with the General Recordkeeping Requirements of 40 CFR 63.4530(a, b, c(4), d, e, f, g, and h) for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP – National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4530(a, b, c(4), d, e, f, g, and h))
- IV.16 For Emission Point AA-024a and AB-024b, the permittee shall comply with Recordkeeping Retention Requirements of 40 CFR 63.4531 for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4531)
- IV.17 For Emission Point AA-024a and AB-024b, the permittee shall comply with the Performance Testing Requirements of 40 CFR 63.4560(c) for specifically demonstrating

compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4560(c))

- IV.18 For Emission Point AA-024a and AB-024b, the permittee shall comply with the Initial and Continuous Compliance Demonstration Requirements of 40 CFR 63.4561 and 63.4563 for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4561 and 63.4563)
- IV.19 For Emission Point AA-024a and AB-024b, the permittee shall comply with the General Requirements for Performance Testing of 40 CFR 63.4564 for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4564)
- IV.20 For Emission Point AA-024a and AB-024b, the permittee shall comply with 40 CFR 63.4565(b) by Determining the Capture Efficiency for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4565(b))
- IV.21 For Emission Point AA-024a and AB-024b, the permittee shall comply with the Requirements for Determining the Destruction Removal Efficiency of 40 CFR 63.4566 for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4566)
- IV.22 For Emission Point AA-024a and AB-024b, the permittee shall comply with the RTO Operating Limits during the Performance Test of 40 CFR 63.4567(a) for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4567(a))
- IV.23 For Emission Point AA-024a and AB-024b, the permittee shall comply with Continuous Parameter Monitoring System (CPMS) Requirements of 40 CFR 63.4568(c)(1) and (3) for specifically demonstrating compliance with 40 CFR 63, Subpart PPPP - National Emission Standards for Plastic Parts and Products. (Ref.: 40 CFR 63.4568(c)(1) and (3))
- IV.24 For Emission Point AA-032as2, the permittee shall monitor and maintain sufficient monthly records to document the Quality and Quantity of Fuel Combusted for compliance with Conditions III.27 of the permit herein. (Ref.: PSD Construction Permit issued January 14, 2015)

PART V  
EMISSION POINT SPECIFIC REPORTING

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-000, AB-000, AC-000 and AD-000 (Entire Facility)	Production Limit	Semi-Annual Reports providing Vehicle Production	V.1	PSD Construction Permit (PSD) issued April 2, 2001 and January 14, 2015
	VOC and HAP	Semi-Annual Reports providing Quality and Quantity of VOC's and HAP's used and Emission Rate	V.2	PSD issued April 2, 2001, December 1, 2005 and January 14, 2015
	MACT Limit Compliance	Monthly Recordkeeping of material HAP content determined by formulation data or analytical data (Method 311)	V.3	
	Opacity	Semi-Annual Reports providing exceedances of weekly VEM's	V.4	PSD issued April 2, 2001 and January 14, 2015
	Performance Testing	5 day Notification of Exceedances from Permit Limitations found during Performance Testing	V.5	
AA-013, AA-024 and AB-024 (System 1 Topcoat and System 1 and 2 Fascia Plastic Plants)	PM	Semi-Annual Reports providing the PM Emission Rate	V.6	PSD issued May 14, 2003 and January 14, 2015
AA-024a and AB-024a (System 1 and System 2 Fascia Plastic Plants Coating Lines)	Subpart PPPP	Initial Notification Requirements	V.7	40 CFR 63.4510(b)
		Notification of Compliance Status	V.8	40 CFR 63.4510(c)
		Semi-annual Compliance Reports	V.9	40 CFR 63.4520(a)

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-013a, AA-024a and AB-024a <i>(System 1 Topcoat and System 1 and 2 Fascia Plastic Plant Coating Lines)</i>	VOC and HAP's	Semi-Annual Reports providing the Quality and Quantity of VOC's and HAP's used and subsequent Emission Rates	V.10	PSD issued April 2, 2001, May 14, 2003, December 1, 2005 and January 14, 2015
AA-013, AA-024a and AB-024 <i>(System 1 Topcoat and System 1 and 2 Fascia Plastic Plant Coating Lines)</i>	Work Practices	Semi-Annual Certification of Monthly Good Work Practices and Implementation of Good Work Practices Plan Recordkeeping Requirements	V.11	
AA-021, AA-026, and AB-026 <i>(System 1 Topcoat and System 1 and 2 Fascia Plastic Plant RTOs)</i>	Temperature	Semi-Annual Reports providing any exceedance of the Continuously Recorded Combustion Temperature	V.12	PSD issued April 2, 2001, May 14, 2003 and January 14, 2015
	RTO Control	Semi-Annual Reports providing the RTO Destruction Efficiency	V.13	
AA-021, AA-026, AB-026, <i>(System 1 Topcoat and System 1 and 2 Fascia Plastic Plant RTOs,)</i>	Fuel Usage	Semi-Annual Reports providing the Quality and Quantity of Fuel Used	V.14	
AA-013a <i>(System 1 Topcoat Coating Operations)</i>	Temperature	Semi-Annual Reports providing any exceedance of the Continuously Recorded Combustion Temperature	V.15	40 CFR 60.395(c)

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
<p style="text-align: center;"><b>AA-013a</b> <i>(System 1 Topcoat Coating Operations)</i></p>	<p style="text-align: center;"><b>Compliance</b></p>	<p style="text-align: center;"><b>Incinerator Compliance Requirements</b></p>	<p style="text-align: center;"><b>V.16</b></p>	<p style="text-align: center;"><b>40 CFR 60.395(a)</b></p>
	<p style="text-align: center;"><b>Exceedances</b></p>	<p style="text-align: center;"><b>Quarterly Reporting of exceedances</b></p>	<p style="text-align: center;"><b>V.17</b></p>	<p style="text-align: center;"><b>40 CFR 60.395(b)</b></p>
	<p style="text-align: center;"><b>Notification Requirements</b></p>	<p style="text-align: center;"><b>30-day Notification of Method 25 Performance Testing</b></p>	<p style="text-align: center;"><b>V.18</b></p>	<p style="text-align: center;"><b>40 CFR 60.395(d)</b></p>
<p style="text-align: center;"><b>AA-032as2</b> <i>(System 1 Topcoat Zone 5 Oven)</i></p>	<p style="text-align: center;"><b>Fuel Usage</b></p>	<p style="text-align: center;"><b>Semi-Annual Reports providing the Quality and Quantity</b></p>	<p style="text-align: center;"><b>V.19</b></p>	<p style="text-align: center;"><b>PSD Construction Permit issued January 14, 2015</b></p>

- V.1 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall submit semi-annual reports providing the calendar year Vehicle Production containing the requirements of Condition IV.1 of the permit herein. The report shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref. PSD Construction Permit Issued April 2, 2001, TVOP Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R.6.3.A(1)(a). and January 14, 2015)
- V.2 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall submit semi-annual reports containing the requirements of Condition IV.2 of the permit herein:
- (a) Quantity used (gal or lb)
  - (b) The percentage of VOC's and HAP's by weight
  - (c) The density (lbs/gal), unless material usages are measured in lbs
  - (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
  - (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials each month and compare the VOC emissions to those allowed under conditions III.2 of the permit herein. The report shall be submitted no later than 30 days from the semiannual periods ending June 30 and December 31.
- (Ref.: PSD Construction Permit issued April 2, 2001, TVOP Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R.6.3.A(1)(a).), PSD Construction Permit Issued December 1, 2005, and January 14, 2015)
- V.3 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall submit semi-annual reports containing the requirements of Condition IV.3 of the permit herein. The report shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref.: PSD Construction Permit issued April 2, 2001, Title V Permit to Operate Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R. 6.3.A(1)(a).), and January 14, 2015)
- V.4 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall continue to submit semi-annual reports containing the requirements of Condition IV.4 of the permit herein. The report shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref.: PSD Construction Permit issued April 2, 2001, TVOP Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R.6.3.A(1)(a).), and January 14, 2015)

- V.5 For Emission Points AA-000, AB-000, AC-000, and AD-000, the permittee shall submit deviations or exceedances from the required Performance Testing within 5 days of the permittee's knowledge of such deviation or exceedance where the Performance Testing is required to determine MACT, BACT, NSPS, or CAM Requirements. (Ref.: TVOP Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R. 6.3.A(1)(a).), and January 14, 2015)
- V.6 For Emission Points AA-013, AA-024 and AB-024, the permittee shall submit semi-annual reports providing the Particulate Matter (PM) Emission Rates in accordance with Condition IV.7 for demonstrating compliance with Conditions III.12 and III.13, of the permit herein. These reports shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31 and shall be submitted with the permittee's Title V Permit to Operate semi-annual reporting requirements. (Ref.: PSD Construction Permit issued May 14, 2003, TVOP Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R.6.3.A(1)(a).), and January 14, 2015)
- V.7 For Emission Points AA-024a and AB-024a, the permittee shall comply with 40 CFR 63, Subpart PPPP, specifically 40 CFR 63.4510(b) and submit an Initial Notification within 120 days from commencement of operation of the Fascia Coating medication. (Ref.: 40 CFR 63.4510(b))
- V.8 For Emission Points AA-024a and AB-024a, the permittee shall comply with 40 CFR 63, Subpart PPPP, specifically 40 CFR 63.4510(c) and submit a Notification of Compliance Status no later than thirty (30) days following the initial compliance period and shall contain the information specified in 40 CFR 63.4510(c)(1) through (11). (Ref.: 40 CFR 63.4510(c))
- V.9 For Emission Points AA-024a and AB-024a, the permittee shall comply with 40 CFR 63, Subpart PPPP, specifically 40 CFR 63.4520(a) and submit a Semiannual Compliance Report with the Title V Permit to Operate as specified in 40 CFR 63.4520(a). (Ref.: 40 CFR 63.4520(a))
- V.10 For Emission Points AA-013a, AA-024a and AB-024a, the permittee shall submit semi-annual reports providing the following (Quality and Quantity of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)):
- (a) Quantity used (gal or lb)
  - (b) The percentage of VOC's and HAP's by weight
  - (c) The density (lbs/gal), unless material usages are measured in lbs

- (d) The permittee may utilize data supplied by the manufacturer, or analysis of VOC content by EPA Test Method 24 and/or 311, 40 CFR 60, Appendix A.
- (e) The permittee shall calculate the VOC and HAP emissions from the use of these materials each month and compare the VOC emissions to those allowed under conditions III.8 and III.9 of the permit herein. The report shall be submitted no later than 30 days from the semiannual periods ending June 30 and December 31.

(Ref.: PSD Construction Permit issued April 2, 2001, TVOP Issued August 2, 2004 (11 Miss. Admin. Code Pt. 2, R.6.3.A(1)(a).), PSD Construction Permit Issued December 1, 2005, and PSD Construction Permit Issued June 26, 2008 (AD-000), and January 14, 2015)

- V.11 For Emission Points AA-013, AA-024 and AB-024, the permittee shall submit semi-annual reports providing the monthly certification statements providing that the permittee implemented Good Work Practices and followed its existing Good Work Practice Plan for minimizing Purge Solvent Emission in accordance with and for demonstrating compliance with Condition IV.6. (Ref.: PSD Construction Permit issued April 2, 2001, May 13, 2003, PSD Construction Permit Issued December 1, 2005 and January 14, 2015)
- V.12 For Emission Points AA-021, AA-026 and AB-026, the permittee shall submit semi-annual reports of any exceedance of Condition IV.10 and IV.15 (Continuously Recorded Combustion Temperature). These reports shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref.: PSD issued April 2, 2001, May 14, 2003 and January 14, 2015)
- V.13 For Emission Points AA-021, AA-026 and AB-026, the permittee shall submit semi-annual reports providing the Regenerative Thermal Oxidizer (RTO) Destruction Efficiency in accordance with Condition IV.11 of the permit herein. These reports shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref.: PSD issued April 2, 2001, May 14, 2003, and January 14, 2015)
- V.14 For Emission Points AA-021, AA-024, and AB-026, the permittee shall submit semi-annual reports providing the Quality and Quantity of Fuel Combusted in accordance with Condition IV.11 of the permit herein. These reports shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref.: PSD issued April 2, 2001, May 14, 2003, and January 14, 2015)



- V.15 For Emission Point AC-013a, where compliance with Condition III.23 is achieved through the use of incineration (RTO), the permittee shall continuously record the incinerator combustion temperature during coating operations and submit a semi-annual report consistent with the Title V Permit to Operate Reporting Requirements containing the following information:
- (a) Every three-hour period shall be reported during which the average temperature measured is more than 28°C (82.4°F) less than the average temperature during the most recent control device performance test at which the destruction efficiency was determined as specified under Condition III.15.
- (1) If no such periods occur, the permittee shall submit a negative report.
- (Ref.: 40 CFR 60.395(c))
- V.16 For Emission Points AA-013a, the permittee shall provide the following for the subsequent performance tests at which destruction efficiency is determined as required by 40 CFR 60.8(a): the combustion, the total mass of VOC per volume of applied coating solids before and after the incinerator, capture efficiency, the destruction efficiency of the incinerator used to attain compliance with the applicable emission limit specified in Conditions III.23, and a description of the method used to establish the fraction of VOC captured and sent to the control device. (Ref.: 40 CFR 60.395(a))
- V.17 For Emission Point AA-013a, the permittee shall identify, record, and submit a written report to the DEQ 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 (acs) is greater than the limit specified under Condition III.23. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the DEQ semiannually. Where compliance is achieved through the use of the capture system and control device (RTO), the volume-weighted average after the control device should be reported. (Ref.: 40 CFR 60.395(b))
- V.18 For Emission Points AA-013a, AA-024a, and AB-024a, the permittee shall notify the DEQ 30 days in advance of any performance test utilizing EPA Test Method 25. (Ref.: 40 CFR 60.395(d))
- V.19 For Emission Points AA-032as2, the permittee shall submit semi-annual reports providing the Quality and Quantity of Fuel Combusted in accordance with Condition IV.24 of the permit herein. These reports shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31. (Ref.: PSD Construction Permit issued January 14, 2015)