Bay Area Air Quality Management District

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Permit Evaluation
and
Statement of Basis
for
MAJOR FACILITY REVIEW PERMIT

for

New United Motor Manufacturing Inc.
Facility # A1438

Facility Address:
45500 Fremont Boulevard
Fremont, CA 94538

Mailing Address:
45500 Fremont Boulevard
Fremont, CA 94538

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Title V Statement of Basis

A. Background

This facility is subject to the Major Facility Operating Permit requirements of Title V of the Federal Clean Air Act, Part 70 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the potential to emit, as defined by BAAQMD Regulation 2-6-218, more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR 70. The permits must contain all applicable requirements (as defined in 40 CFR § 70.2), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility number that consists of a letter and a 4-digit number. This facility number is also considered to be the identifier for the permit.

B. Facility Description

New United Motor Manufacturing, Inc. (NUMMI) is an automobile assembly plant operated as a joint venture of General Motors Corporation and Toyota Motor Corporation. NUMMI is located in Fremont, California and employs almost 5,200 people. Each year NUMMI manufacturers about 350,000 vehicles.

The manufacturing operations at NUMMI include metal stamping, body welding, plastic plant, painting, and vehicle assembly. Metal Stamping operations include the forming from coiled steel the major body panels, which make up the car body shell and truck cab. The body welding operations weld together the steel panels of the vehicle.

The Plastic Plant manufactures the plastic bumpers and instrument panels utilized in the vehicles. These parts are manufactured using injection-molding machines, which are exempt from permitting requirements. The bumpers and instrument panels are then painted.

Painting also occurs for the car bodies and truck cabs. Before painting, the car bodies and truck cabs are first cleaned, given rust inhibiting undercoat of Electrophrophoretic Primer and sealant to soundproof and protect the vehicle. Then each body receives a second coat of paint, called Primer Surfacer, followed by sanding and the application of a final Basecoat and Clearcoat layer of paint. Each body is oven-cured at approximately 300 °F for 28 minutes, inspected and sent to assembly line.

The assembly line is the final installation process where all the various parts of the vehicle are assembled into the vehicle to complete the manufacture of the vehicle.

NUMMI's major sources of air emissions are its painting operations (VOC) and natural gas combustion (NOx) for VOC control and air heating.

C. Permit Content

The legal and factual basis for the permit follows. The permit sections are described in the order that they are presented in the permit.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.5, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Condition I.J has been added to ensure that facilities do not exceed their capacity limits.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that emit more than 2 tons of a regulated air pollutant as defined in BAAQMD Rule 2-6-222 per year or 400 tons of a hazardous air pollutant as defined in BAAQMD Rule 2-6-210 per year.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will be listed in this table but will have an "S" number. An abatement device that is also a source (such as a thermal oxidizer that burns fuel) will have an "A" number.

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District's regulations. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Following are explanations of the differences in the equipment list between the time that the facility originally applied for a Title V permit and the permit proposal date:

The following sources have been added since the original Title V application was received in July 1996:

Source #	Source Names
3500-3502	Cold Cleaners
3503	Purge Thinner Tank
3505	Waste Solvent Tank
3507-3509	Paint Circulation Tanks
3511-3530	Paint Circulation Tanks
3531	SYSTEM #25 Paint Mix Tank
3532	SYSTEM #25 Paint Circulation Tank
3533	SYSTEM #26 Paint Circulation Tank
3536	SYSTEM #29 Paint Mix Tank
3537	SYSTEM #43 Paint Circulation Tank
3538	SYSTEM #43 Paint Circulation Tank
3543-3545	Paint Mix Tanks
3547-3558	Paint Mix Tanks
3560	SYSTEM #24 Paint Mix Tank
3565-3568	Paint Mix Tanks
3600	Cold Cleaner
3601	Cold Cleaner
10112	Recoat Sanding Booth
30960	General Cleaning and Painting Cleaning

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Section VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, appear in a Title V permit if they are considered a significant source pursuant to the definition in BAAQMD Rule 2-6-239.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) after their corresponding District Rules. SIP rules are District rules that have been approved by EPA into the California State Implementation Plan. SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes". If the SIP rule is not the current District rule, the SIP rule or the necessary portions of the SIP rule are cited separately after the District rule. The SIP portions will be federally enforceable; the non-SIP versions will not be federally enforceable, unless EPA has approved them through another program.
- Other District requirements, such as the Manual of Procedures, if necessary.
- Federal Requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit.

Complex Applicability Determinations

Some of the sources at the facility are subject to 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, because they are a prime coat operation, guide coat operation or topcoat operation in an automobile or light-duty truck assembly plant, and because they were built or modified after December 24, 1980.

Section IV of the permit, Source-Specific Applicable Requirements, shows which particular sources are subject.

The facility is not subject to any National Emission Standard for Hazardous Air Pollutants in 40 CFR 61 because it does not meet the applicability requirements for any standard.

The facility is not subject to any National Emission Standard for Hazardous Air Pollutants in 40 CFR 63 because it is not a major source of hazardous air pollutants (HAPs).

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions, among others:

"409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted."

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit only contains elements 2-6-409.10.1 and 2-6-409.10.2.

The BAAQMD Enforcement and Compliance Division has conducted a review of compliance over the past year and has no records of compliance problems at this facility. The compliance report is contained in Appendix C of this permit evaluation and statement of basis.

VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and edited the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

Where necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

All changes to existing permit conditions are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all 'strike-out" language will be deleted; all "underline" language will be retained.

The existing permit conditions are generally derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). It is also possible for permit conditions to be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff.

Conditions that are obsolete or that have no regulatory basis have been deleted from this permit. The regulatory basis has been referenced following each condition. The regulatory basis may be a rule or regulation. The District is also using the following codes for regulatory basis:

- BACT: This code is used for a condition imposed by the APCO to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This code is used for a condition imposed by the APCO that limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This code is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This code is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit pursuant to Regulation 2, Rule 2.
- TRMP: This code is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

Conditions may also have been deleted due to the following:

- Redundancy in record-keeping requirements.
- Redundancy in other conditions, regulations and rules.
- The condition has been superseded by other regulations and rules.
- The equipment has been taken out of service or is exempt.
- The event has already occurred (i.e. initial or start-up source tests).

Following are the details of specific changes for this permit:

Condition # 207 was the original permit condition for the original passenger line of NUMMI when they began operation in 1984. However, since that time, the majority of the passenger line sources have been replaced by that of the new passenger paint shop. The sources of the new passenger paint shop were added to the Title V permit, since the original Title V application was received on July 1996 and are listed below:

Source #	Source Names
3500-3502	Cold Cleaners
3503	Purge Thinner Tank
3505	Waste Solvent Tank
3507-3509	Paint Circulation Tanks
3511-3530	Paint Circulation Tanks
3531	SYSTEM #25 Paint Mix Tank
3532	SYSTEM #25 Paint Circulation Tank
3533	SYSTEM #26 Paint Circulation Tank
3536	SYSTEM #29 Paint Mix Tank
3537	SYSTEM #43 Paint Circulation Tank
3538	SYSTEM #43 Paint Circulation Tank
3543-3545	Paint Mix Tanks
3547-3558	Paint Mix Tanks
3560	SYSTEM #24 Paint Mix Tank
3565-3568	Paint Mix Tanks
3600	Cold Cleaner
3601	Cold Cleaner
10112	Recoat Sanding Booth
30960	General Cleaning and Painting Cleaning

The sources that remain from the original passenger line (listed below) are still subject to Condition No. 207. As part of the Title V review process, Condition No. 207 was amended to remove reference to those sources that were removed (and subsequently replaced by those of the new passenger paint shop). In addition, permit condition language was amended to clarify the intent of the permit conditions. However, there were no changes to emissions limits made so as to require a modification of the permits for those sources. Daily and hourly limits were removed because they were derived from monthly limits and demonstrated by monthly recordkeeping. All changes made were administrative in nature and have no effect on emissions. Appendix A contains the text of the original Condition No. 207, and Appendix B contains the detailed

summary of the administrative changes. Although some of the passenger line sources were identified to be subject to Regulation 6, no additional particulate monitoring requirements were added, because the particulate emissions from the following sources comply with Regulation 6 during normal operation:

Source #, Source Name
S2, Passenger Body Elpo Dip Tank,
S3, Passenger Body Elpo Oven
S60, Passenger Undercoating Booth
S61, Passenger Blackout Chassis Booth
S62, Passenger Fuel Tank Booth
S63, Passenger Protective Gas tank Oven
S71, Passenger Cavity Wax Booth
S72, Passenger Exterior, Underbody & Engine Wax Booth
S73, Passenger Exterior Wax Hot Air Dryer
S101, Spare Parts ELPO Tank
S102, Spare Parts ELPO Oven
S801, Stamping Plant Fugitive Solvent Emission
S803, Passenger Sealer Deck Line (Fugitive)
S804, Passenger Fugitive Repair Priming
S805, Body Shop Assembly Areas
S807, Anti-Chip & Wheelhouse PVC Booth
S808, Passenger/Truck Sealer Oven
S813, Passenger Fugitive Trial Application Area – Bead Sealer
S817, Passenger Anti-Chip Mix Tank
S818, Passenger Anti-Chip II Mix Tank

The other changes to conditions were to correct typos, grammar, or terminology to clarify intent. Basis identifiers were added to each condition part to clarify the basis for each condition part. Some conditions for the same source were merged together to form one combined condition. Notes explaining some of the amendments are indicated in the bolded and italicized brackets. Additions are indicated by underlines, while deletions are indicated by strikethroughs.

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements that apply to each source. The summary includes a citation for each monitoring requirement, frequency, and type. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of

compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements**.** It follows that, although Title V calls for a re-examination of all monitoring**,** there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation**.** Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate**.**

NOX Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S57, S58, S59, S65, S1070, S1071, Booths, Heaters, Oven	BAAQMD Condition #10320, Part 4	S57 + S58 + S59 + S65 + S1070 + S1071 Emissions < 26.16 TPY	Annual Source Test
S1002, Truck Ed Oven	BAAQMD Condition # 9158, Part 7	Emissions < 0.1 lb/MMBTU	Annual Source Test
S1005, Truck Undercoat Booth	BAAQMD Condition # 9159, Part 7	Emissions < 0.1 lb/MMBTU	One Source Test Per Title V Permit Term
S1007, Truck Sealer Oven	BAAQMD Condition #9158, Part 7	Emissions < 0.1 lb/MMBTU	Annual Source Test
S1009, Truck Primer Heater Boxes	BAAQMD Condition #9158, Part 7	Emissions < 0.1 lb/MMBTU	Annual Source Test
S1014, Truck Topcoat Booth	BAAQMD Condition #9164, Part 9	Emissions < 0.1 lb/MMBTU	Annual Source Test
S1015, Truck Topcoat Oven	BAAQMD Condition #9158, Part 7	Emissions < 0.1 lb/MMBTU	Annual Source Test
S1056, S1057, Boilers	BAAQMD 9-7-301.1	30 ppmv @3%O2, dry, 3-hr average	Annual Source Test

NOX Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
	BAAQMD Condition # 9174, Part 2	30 ppmv @ 3%O2, dry, 3-hr average	Annual Source Test
S1061, S1062, Booth and Oven	BAAQMD Condition #10481, Part 4	Emissions < 6.06 TPY	Annual Source Test
S3007, S3008, S3009, S3014, S3015, S3016, S3017, S3018, S3019, S3020, Ovens and Booths	BAAQMD Condition #14205, Part 9	S3007 + S3008 + S3009 + S3014 + S3015 + S3016 + S3017 + S3018 + S3019 + S3020 Emissions < 40.54 TPY	Annual Source Test
A571, Plastic Plant Thermal Oxidizer	BAAQMD Condition #10320, Part 21	NOx from A571 < 1.72 tons/month	Annual Source Test

NOx Discussion:

Natural gas usage is limited at the facility by permitting conditions and/or maximum firing rate. The facility is required to keep records of the quantity of natural gas that is burned. NOx emissions are dependent on the amount of natural gas burned. No other fuels are burned at the facility.

From prior source test results at NUMMI, the maximum NOX emission factor for the combustion of natural gas in a booth, oven, and thermal oxidizer is approximately 0.1 pound per million British Thermal Units (lb/MMBTU) of natural gas. The following calculations of potential to emit are based on the emission factor and their maximum allowed natural gas usage (in million therms (MMTherms) per year (yr).

Sources S57, S58, S59, S65, S1070, S1071 (including A571): 15.8 tons NOx/year [3.16 MMTherms/yr (Part 2 of Condition 10320) and 0.1 lb/MMBTU], which is below the limit of 26.16 TPY (Part 4 of Condition # 10320)

Sources S1061, S1062: 6.0 tons NOx/year [1.2 MMTherms/yr (Part 2 of Condition 10481) and 0.1 lb/MMBTU], which is below the limit of 6.06 TPY (Part 4 of Condition 10481).

S3007, S3008, S3009, S3014, S3015, S3016, S3017, S3018, S3019, S3020: 40.54 tons NOx/year [Using the NOx emission factors of 0.1, 0.15, 0.1, and 0.023 pound per million British Thermal Units (lb/MMBTU) for the Thermal Oxidizers, Air Supply Houses, Heater Boxes, and Boilers, respectively (from application # 25397 evaluation report) and maximum firing rate of 9.63 MMTherms/yr (Part 6 of Condition 14205)], which is how the limit of 40.54 TPY (Part 9 of Condition 14205) was developed. Source testing has verified compliance with these conditions.

CO Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S57 + S58 + S59 + S65 + S1070 + S1071	BAAQMD Condition #10320, Part 5	S57 + S58 + S59 + S65 + S1070 + S1071 Emissions < 46.48 TPY	Annual Source Test
S1056, S1057, Boilers	BAAQMD 9-7-301.2	400 ppmv @3%O2, dry, 3-hr average	Annual Source Test
S1061, S1062, Booth and Oven	BAAQMD Condition #10481, Part 5	Emissions < 2.52 TPY	Annual Source Test
S3007, S3008, S3009, S3014, S3015, S3016, S3017, S3018, S3019, S3020	BAAQMD Condition #14205, Part 10	S3007 + S3008 + S3009 + S3014 + S3015 + S3016 + S3017 + S3018 + S3019 + S3020 Emissions < 50.46 TPY	Annual Source Test

CO Discussion:

Natural gas usage is limited at the facility by permit conditions and/or maximum firing rate. The facility is required to keep records of the quantity of natural gas that is burned. CO emissions are dependent on the amount of natural gas burned. No other fuels are burned at the facility.

From prior source test results at NUMMI, the maximum CO emission factor for the combustion of natural gas in a booth, oven, and thermal oxidizer is approximately 0.25 per million British Thermal Units (lb/MMBTU) of natural gas. The following calculations of potential to emit are based on the emission factor and their maximum allowed natural gas usage (in million therms (MMTherms) per year (yr).

Sources S57, S58, S59, S65, S1070, S1071 (including A571): 39.5 tons CO/year [3.16 MMTherms/yr (Part 2 of Condition 10320) and 0.25 lb/MMBTU], which is below the limit of 46.48 TPY (Part 5 of Condition # 10320)

Sources S1061, S1062: 2.52 tons CO/year [Using CO emission factor of 0.04 lb/MMBTU (from application # 10741) and 1.2 MMTherms/yr (Part 2 of Condition 10481)], which is how the limit of 2.52 TPY (Part 4 of Condition 10481) was developed. Source testing has verified compliance with these conditions.

S3007, S3008, S3009, S3014, S3015, S3016, S3017, S3018, S3019, S3020: 50.46 tons CO/year [Using the CO emission factors of 0.274, 0.12, 0.1, and 0.034 pound per million British Thermal Units (lb/MMBTU) for the Thermal Oxidizers, Air Supply Houses, Heater Boxes, and Boilers, respectively (from application # 25397 evaluation report) and maximum firing rate of 9.63 MMTherms/yr (Part 6 of Condition 14205)], which is how the limit of 50.46 TPY (Part 10 of Condition 14205) was developed. Source testing has verified compliance with these conditions**.**

SO_2 Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
All combustion sources	BAAQMD 9-1-301	Ground level concentrations of SO2 shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
	BAAQMD 9-1-302	300 ppm (dry)	None

SO2 Discussion:

Sulfur Dioxide (SO2) is generated when sulfur in fuel is burned. A small amount of sulfur dioxide is generated by burning natural gas. All of the combustion sources at the facility burn utility natural gas, since no other gas is available at the site.

The general emission limit for SO2 pursuant to Regulation 9-1-302 is 300 ppm, dry. The specification for utility-grade natural gas is 5 grains of total sulfur per one hundred standard cubic foot of natural gas. One molecule of SO2 is generated for each sulfur atom.

About 8.7 cubic feet of combustion gases are generated for each cubic foot of natural gas burned, but the amount of sulfur in the gas remains constant. Therefore, if the concentration of sulfur in the natural gas is 5 grains per one hundred standard cubic foot, the concentration in the combustion gases will be 10 ppm or less (as SO2):

SO2 = (5 gr/100 scf)(lb/7000 gr)(lbmole/32 lb)(387 scf/lbmol)(1/8.7) = 10 ppm

Since the concentration in the combustion gases will be less than 3.3% of the limit, there is no need to perform monitoring for SO2 at this facility. (Typically, PG&E gas contains only about 0.2 grains per one hundred standard cubic feet resulting in an average SO2 concentration of 0.4 ppm.)

All facility combustion sources are subject to the SO2 emission limitations in District Regulation 9, Rule 1 (ground-level concentration and emission point concentration). In EPA's June 24, 1999 agreement with the CAPCOA and ARB, "Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 9, Rule 1, since violations of the regulation are unlikely. Therefore, no monitoring is proposed for this requirement.

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S3, S41, S58, S63, S65, S73, S102, S808, S1002, S1007, S1009, S1015, S1051, S1056, S1057, S1062, S1071, S3009, S3015, S3017 (combustion sources)	BAAQMD Regulation 6-301	Ringelmann 1.0	None
S2, S57-S62, S65, S71, S72, S101, S818, S900, S1005, S1006, S1008, S1010, S1012, S1014, S1017, S1018, S3018-S1021, S1050, S1070, S1071, S3008, S3014, S3016	BAAQMD Regulation 6-301	Ringelmann 1.0	Weekly pressure drop monitoring
S804, S805, S807, S1003, S1004, S1011, S1019, S1021	BAAQMD Regulation 6-301	Ringelmann 1.0	Monthly pressure drop monitoring
S802, S803, S813, S1020, S1809, S2826, S10112	BAAQMD Regulation 6-301	Ringelmann 1.0	Monthly visible emissions check
S2, S57-S62, S65, S71, S72, S101, S818, S900, S1005, S1006, S1008, S1010, S1012, S1014, S1017, S1018, S3018-S1021, S1050, S1070, S1071, S3008, S3014, S3016	BAAQMD Regulation 6-310	0.15 gr/dscf	Weekly pressure drop monitoring
S804, S805, S807, S1003, S1004, S1011, S1019, S1021	BAAQMD Regulation 6-310	0.15 gr/dscf	Monthly pressure drop monitoring
S802, S803, S813, S1020, S1809, S2826, S10112	BAAQMD Regulation 6-310	0.15 gr/dscf	Monthly visible emissions check
S3, S41, S58, S63, S65, S73, S102, S808, S1002, S1007, S1009, S1015, S1051, S1056, S1057, S1062, S1071, S2826, S3009, S3015, S3017 (combustion sources)	BAAQMD Regulation 6-310.3	0.15 gr/dscf at 6% O2	None

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S2, S57-S62, S65, S71, S72, S101, S818, S900, S1005, S1006, S1008, S1010, S1012, S1014, S1017, S1018, S3018-S1021, S1050, S1070, S1071, S3008, S3014, S3016	BAAQMD Regulation 6-311	4.10P0.67 lb/hr, where P is process weight, ton/hr	Weekly pressure drop monitoring
S804, S805, S807, S1003, S1004, S1011, S1019, S1021	BAAQMD Regulation 6-311	4.10P0.67 lb/hr, where P is process weight, ton/hr	Monthly pressure drop monitoring
S802, S803, S813, S1020, S1809, S2826, S10112	BAAQMD Regulation 6-311	4.10P0.67 lb/hr, where P is process weight, ton/hr	Monthly visible emissions check
S3, S41, S58, S63, S65, S73, S102, S808, S1002, S1007, S1009, S1015, S1051, S1056, S1057, S1062, S1071, S2826, S3009, S3015, S3017 (combustion sources)	BAAQMD Regulation 6-311	4.10P0.67 lb/hr, where P is process weight, ton/hr	None

PM Discussion:

BAAQMD Regulation 6 “Particulate Matter and Visible Emissions”

Visible Emissions

BAAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for periods or aggregate periods less than 3 minutes in any hour). Visible emissions are normally not associated with combustion of gaseous fuels, such as natural gas. All of the combustion sources at this facility burn natural gas exclusively, therefore, per the EPA's June 24, 1999 agreement with CAPCOA and ARB titled "Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", the EPA does not require the monitoring of PM for the combustion emissions from these sources.

Particulate Weight Limitation

BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. Section 310.3 limits filterable particulate emissions from "heat transfer operations" to 0.15 gr/dscf @ 6% O_2. These are the "grain loading" standards.

Exceedances of the grain loading standards are normally not associated with combustion of gaseous fuels, such as natural gas. All of the combustion sources at this facility burn natural gas exclusively, therefore, per the EPA's July 2001 agreement with CAPCOA and ARB entitled "CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources: Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", the EPA does not require the monitoring of PM for the combustion emissions from these sources.

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S3, S101, S102, S1001, S1002, S3007, S3008, S3009	BAAQMD 8-13-306	Electrophoretic Primer VOC < 145 g/l (1.2 lb/gal)	Records
S3, S60, S61, S62, S63, S71, S72, S101, S102, S803, S804, S805, S813, S807, S808, S817, S818	BAAQMD Condition # 207 Part 1(a)	Total* Emissions < 459.2 TPY (before abatement) or 250.5 TPY (after abatement)	Records
S3	BAAQMD Condition # 207 Part 1(d)	Passenger Body Elpo (S2 + S3) Emissions < 133.9 TPY (before abatement) or 66.4 TPY (after abatement)	Records
S3	BAAQMD Condition # 207 Part 2(a)	Passenger Body Elpo VOC < 1.21 lb/gal	Records
S3	BAAQMD Condition # 207 Part 2(a)	Passenger Body Elpo (S2 + S3) Usage < 221,334 gal/yr, and 21,725 gal/month	Records
S3	BAAQMD Condition # 4281 Part 2	A4 Destruction Efficiency > 90 wt%	Source Test

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S3	BAAQMD Condition # 4281 Part 2	Temperature > 1200 oF	Temperature
S57, S58, S59, S65	BAAQMD 8-13-307.1	Flexible Parts Primer VOC < 490 g/l (4.1 lb/gal)	Records
S57, S58, S59, S65	BAAQMD 8-13-307.2	Color Topcoat VOC < 450 g/l (3.8 lb/gal)	Records
S57, S58, S59, S65	BAAQMD 8-13-307.3	Basecoat/Clearcoat VOC < 540 g/l (4.5 lb/gal)	Records
S57, S58, S59, S65	BAAQMD Condition # 10320 Part 9	Emissions < 173 TPY	Records
S57, S58, S59, S65	BAAQMD Condition # 10320 Part 10	Primer Usage < 57,994 gal/yr, Non-Metallic High Solids Usage < 32,586 gal/yr, Base Coat Usage < 37,127 gal/yr, Clear Coat Usage < 48,350 gal/yr; or compliance with Condition # 10320 Part 9	Records
S57, S58, S59, S65	BAAQMD Condition # 10320 Part 19	A571 Temperature > 1400 oF	Temperature
S57, S58, S59, S65	BAAQMD Condition # 10320 Part 20	A571 Destruction Efficiency > 98.5%, if inlet concentration of VOC > 500 ppmv, as methane; or A571 Destruction Efficiency > 95%, if inlet concentration of VOC < 500 ppmv, as methane	Source Test
S60, S61, S71, S72, S73, S803, S804, S805, S813, S807, S808, S817, S818, S1005, S1006, S1007, S1010, S1017, S1018, S1019, S3014, S3015, S3016, S3017, S3018, S3019, S3020	BAAQMD 8-13-302.1	Spray Primer VOC < 1.80 kg/l (15.0 lb VOC/gal of applied solids)	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S60, S61, S71, S72, S73, S803, S804, S813, S1008, S1009, S1010, S1012, S1014, S1015, S1017, S3014, S3015 S3016, S3017, S3018, S3019, S3020	BAAQMD 8-13-302.2	Primer Surfacer VOC < 1.80 kg/l (15.0 lb VOC/gal of applied solids)	Records
S60, S61, S71, S72, S73, S803, S804, S813, S1010, S1014, S1015, S1017, S1018, S1020, S1021, S1053, S3014, S3015, S3016, S3017, S3018, S3019, S3020	BAAQMD 8-13-302.3	Topcoat VOC < 1.80 kg/l (15.0 lb VOC/gal of applied solids)	Records
S60	BAAQMD Condition # 207 Part 1(d)	Undercoating (S60 + S803) Emissions < 93.8 TPY (before abatement) or 14.5 TPY (after abatement)	Records
S60	BAAQMD Condition # 207 Part 2(a)	Undercoating VOC < 0.75 lb/gal	Records
S60	BAAQMD Condition # 207 Part 2(a)	Undercoating (S60 + S803) Usage < 328,967 gal/yr, 32,290 gal/month	Records
S61	BAAQMD Condition # 207 Part 1(d)	Blackout Chassis Emissions < 18.1 TPY	Records
S61	BAAQMD Condition # 207 Part 2(a)	Blackout Chassis VOC < 3.02 lb/gal	Records
S61	BAAQMD Condition # 207 Part 2(a)	Blackout Chassis Usage < 11,990 gal/yr, 1,177 gal/month	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S62, S63, S1050, S1051, S1070, S1071	BAAQMD 8-13-308	Off-Line VOC < 340 g/l (2.8 lb/gal)	Records
S62, S63	BAAQMD Condition # 207 Part 1(d)	Protective Fuel Tank < 19.1 TPY (before abatement) or 9.3 TPY (after abatement)	Records
S62, S63	BAAQMD Condition # 207 Part 2(a)	Protective Fuel Tank VOC < 0.95 lb/gal	Records
S62, S63	BAAQMD Condition # 207 Part 2(a)	Protective Fuel Tank Usage < 40,124 gal/yr, 3,497 gal/month	Records
S71	BAAQMD Condition # 207 Part 1(d)	Cavity Wax Emissions < 2.5 TPY	Records
S71	BAAQMD Condition # 207 Part 1(d)	Hinge Wax Emissions < 4.9 TPY	Records
S71	BAAQMD Condition # 207 Part 2(a)	Cavity Wax VOC < 0.94 lb/gal	Records
S71	BAAQMD Condition # 207 Part 2(a)	Hinge Wax VOC < 5.01 lb/gal	Records
S71	BAAQMD Condition # 207 Part 2(a)	Cavity Wax Usage < 5,326 gal/yr, 523 gal/month	Records
S71	BAAQMD Condition # 207 Part 2(a)	Hinge Wax Usage < 1,962 gal/yr, 193 gal/month	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S72	BAAQMD Condition # 207 Part 1(d)	Engine Wax Emissions < 0.5 TPY	Records
S72	BAAQMD Condition # 207 Part 2(a)	Engine Wax VOC < 0.59 lb/gal	Records
S72	BAAQMD Condition # 207 Part 2(a)	Engine Wax Usage < 1,538 gal/yr, 151 gal/month	Records
S73	BAAQMD Condition # 207 Part 1(d)	Exterior Wax VOC < 5.9 TPY	Records
S73	BAAQMD Condition # 207 Part 2(a)	Exterior Wax VOC < 1.50 lb/gal	Records
S73	BAAQMD Condition # 207 Part 2(a)	Exterior Wax Usage < 7,900 gal/yr, 776 gal/month	Records
S101, S102	BAAQMD Condition # 207 Part 1(d)	Spare Parts ELPO Emissions < 17.2 TPY (before abatement) or 6.9 TPY (after abatement)	Records
S101, S102	BAAQMD Condition # 207 Part 2(a)	Spare Parts Elpo VOC < 1.21 lb/gal	Records
S101, S102	BAAQMD Condition # 207 Part 2(a)	Spare Parts Elpo Usage < 28,400 gal/yr, 3,156 gal/month	Records
S101, S102	BAAQMD Condition # 207 Part 3(A)(1)	Spare Parts Elpo Oven Destruction Efficiency > 60 wt%	Source Test

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S101, S102	BAAMQD Condition # 207 Part 3(A)(1)	Temperature > 800 oF	Temperature
S405, S406, S408, S414, S965, S992, S1511, S1512, S3503, S3505	None	None	Records
S406	BAAQMD Condition # 10709 Part 1	Throughput < 530,170 gals/yr	Records
S627, S801, S802, S966, S967, S990, S991, S996-S999, S1413-S1417, S1423-S1428, S1439-S1447, S1449-S1451, S1457, S1459, S1460, S1480, S1482, S1489, S1490, S1809, S3507-S3509, S3511-S3527, S3529-S3533, S3536, S3543-S3545, S3547-S3558, S3560, S3565-S3568	BAAQMD Regulation 8-2-301	Emissions < 15 lb/day or < 300 ppmv	None
S801, S802, S803, S804, S805, S813	BAAQMD Condition # 207 Part 1(b)	Fugitive Emissions from Body & Assembly (S801 + S802 + S803 + S804 + S805 + S813) < 69 TPY and 6.8 ton/month	Records
S60, S803	BAAQMD Condition # 207 Part 1(a)	Total* Emissions < 459.2 TPY (before abatement) or 250.5 TPY (after abatement)	Records
S60, S803	BAAQMD Condition # 207 Part 1(d)	Undercoating (S60 + S803) Emissions < 93.8 TPY (before abatement) or 14.5 TPY (after abatement)	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S801, S802, S803, S804, S805, S813	BAAQMD Condition # 207 Part 1(d)	Underbody Black (S801 + S802 + S803 + S804 + S805 + S813) Emissions < 5.5 TPY	Records
S803	BAAQMD Condition # 207 Part 2(a)	Undercoating VOC < 0.75 lb/gal	Records
S801, S802, S803, S804, S805, S813	BAAQMD Condition # 207 Part 2(a)	Underbody Black VOC < 3.02 lb/gal	Records
S803	BAAQMD Condition # 207 Part 2(a)	Undercoating (S60 + S803) Usage < 328,967 gal/yr, 32,290 gal/month	Records
S803, S804, S813	BAAQMD Condition # 207 Part 2(a)	Underbody Black (S801 + S802 + S803 + S804 + S805 + S813) Usage < 3,642 gal/yr, 357 gal/month	Records
S805	BAAQMD Condition # 207 Part 1(d)	Final Repair Emissions < 2.0 TPY	Records
S805	BAAQMD Condition # 207 Part 1(d)	Paint Shop Sealant Emissions < 17.0 TPY (before abatement) or 5.4 TPY (after abatement)	Records
S805	BAAQMD Condition # 207 Part 1(d)	Repair Primer Emissions < 5.1 TPY	Records
S805, S807	BAAQMD Condition # 207 Part 1(d)	Underbody Wax (S805 + S807) Emissions < 5.3 TPY	Records
S805	BAAQMD Condition # 207 Part 2(a)	Final Repair VOC < 6.41 lb/gal	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S805	BAAQMD Condition # 207 Part 2(a)	Final Repair Usage < 637 gal/yr, 63 gal/month	Records
S805	BAAQMD Condition # 207 Part 2(a)	Paint Shop Sealant VOC < 0.39 lb/gal	Records
S805	BAAQMD Condition # 207 Part 2(a)	Paint Shop Sealant Usage < 87,129 gal/yr, 10,753 gal/month	Records
S805	BAAQMD Condition # 207 Part 2(a)	Repair Primer VOC < 5.83 lb/gal	Records
S805	BAAQMD Condition # 207 Part 2(a)	Repair Primer Usage < 1,750 gal/yr, 172 gal/month	Records
S805, S807	BAAQMD Condition # 207 Part 2(a)	Underbody Wax (S805 + S807) VOC < 1.04 lb/gal	Records
S805, S807	BAAQMD Condition # 207 Part 2(a)	Underbody Wax (S805 + S807) Usage < 10,096 gal/yr, 991 gal/month	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 1(d)	Anti-Chip II (S807 + S818) Emissions < 31.4 TPY (before abatement) or 7.2 TPY (after abatement)	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 1(d)	Anti-Chip II (S807 + S817) Emissions < 28.0 TPY (before abatement) or 22.0 TPY (after abatement)	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 1(d)	Underbody Wax (S805 + S807) Emissions < 5.3 TPY	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S807, S808, S817, S818	BAAQMD Condition # 207 Part 2(a)	Anti-Chip II VOC < 2.09 lb/gal	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 2(a)	Anti-Chip IB VOC < 4.06 lb/gal	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 2(a)	Underbody Wax VOC < 1.04 lb/gal	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 2(a)	Anti-Chip II (S807 + S818) Usage < 30,009 gal/yr, 2,946 gal/month	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 2(a)	Anti-Chip IB (S807 + S817) Usage < 13,786 gal/yr, 1,353 gal/month	Records
S807, S808, S817, S818	BAAQMD Condition # 207 Part 3(B)(2)	A808 Temperature > 1400 oF	Temperature
S807, S808, S817, S818	BAAQMD Condition # 207 Part 3(B)(2)	A808 Destruction Efficiency > 98.5%, if inlet concentration of VOC > 500 ppmv, as methane; or A808 Destruction Efficiency > 95%, if inlet concentration of VOC < 500 ppmv, as methane	Source Test
S806	BAAQMD Condition # 7799	Throughput < 1.1 E6 gals/yr	Records
S824, S825, S1502, S1503, S1504, S1506, S1507, S2000, S2001, S2002, S2004-S2009	BAAQMD Condition # 16780 Part 1 & Part 2	Emissions < 5,068 lbs/yr, or Usage < 160 gal/yr Safety Kleen 105, and < 60 gal/yr SystemOne Ashland Solvent, and < 500 gal/yr NUMMI Solvent IV	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S960, S961, S962, S963, S964, S1072, S1509	BAAQMD Condition # 10320 Part 31	Emissions < 134.83 TPY	Records
S960, S961, S962, S963, S964, S1072, S1509	BAAQMD Condition # 10320 Part 32	Cleanup Solvent Collected/Recovered > 77%, or compliance with Condition # 10320 Part 31	Records
S1001, S1002, S1005-S1008, S1010, S1012, S1014, S1015, S1017-S1021, S1050, S1051, S1053, S1061, S1062, S1803, S3007, S3008, S3009, S3014-S3020	40 CFR 60 Subpart MM Section 60.392 (a)(1)	Prime Coat Operation VOC < 0.17 kg/l of applied coating solids, when Solids Turnover Ratio (RT) > 0.16	Records
S1001, S1002, S1005-S1010, S1012, S1014, S1015, S1017-S1021, S1050, S1051, S1053, S1061, S1062, S1803, S3007, S3008, S3009, S3014-S3020	40 CFR 60 Subpart MM Section 60.392 (a)(2)	Prime Coat Operation VOC < 0.17 x 350 (0.16-RT) kg/l of applied coating solids, when Solids Turnover Ratio (RT) > 0.04 and < 0.16	Records
S1001, S1002, S1005-S1010, S1012, S1014, S1015, S1017-S1021, S1050, S1051, S1053, S1061, S1062, S1803, S3007, S3008, S3009, S3014-S3020	40 CFR 60 Subpart MM Section 60.392 (a)(3)	Prime Coat Operation VOC < 0.17 kg/l of applied coating solids, when Solids Turnover Ratio (RT) < 0.04	Records
S1001, S1002, S1003-S1012, S1014, S1015, S1017-S1021, S1053, S1803, S1809	BAAQMD Condition # 9156 Part 5	Truck Vehicle Line* Emissions from non-combustion operations < 779.17 TPY	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1001	BAAQMD Condition # 9257 Part 1	Elpo Primer VOC < 0.59 lb/gal	Records
S1001	BAAQMD Condition # 9257 Part 2	Elpo Primer Usage < 107,371 gal/yr; < 11,167 gal/month; < 515 gals/day; or compliance with Condition # 9257 Part 5	Records
S1001	BAAQMD Condition # 9257 Part 5	Emissions < 0.99 ton/month; < 9.5 ton/yr	Records
S1002, S1007, S1009, S1015	BAAQMD Condition # 9158 Part 2a	Temperature > 1400 oF, or compliance with Condition # 9158 Parts 9 & 10	Temperature
S1002, S1007, S1009, S1015	BAAQMD Condition # 9158 Part 2b and c	Destruction Efficiency > 98%, if VOC concentration > 1200 ppm as C1; or Destruction Efficiency > 95-98%, if VOC concentration > 500 ppm and < 1200 ppm (linearly)	Source Test
S1002	BAAQMD Condition # 9158 Part 8	Emissions < 0.33 ton/month; < 3.21 ton/yr	Records
S1005-S1010, S1012, S1014, S1015, S1017-S1021, S1050, S1051, S1053, S1061, S1062, S1803, S3014-S3020	40 CFR 60 Subpart MM Section 60.392 (b)	Guide Coat VOC < 1.40 kg/l of applied coating solids	Records
S1005-S1010, S1012, S1014, S1015, S1017-S1021, S1050, S1051, S1053, S1061, S1062, S1803, S3014-S3020	40 CFR 60 Subpart MM Section 60.392 (c)	Topcoat Operation VOC < 1.47 kg/l of applied coating solids	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1005	BAAQMD Condition # 9159 Part 1	PVC Undercoat VOC < 0.6 lb/gal	Records
S1005	BAAQMD Condition # 9159 Part 2	PVC Undercoat Usage < 291,757 gal/yr; < 30,343 gal/month; or compliance with Condition # 9159 Part 5	Records
S1005	BAAQMD Condition # 9159 Part 5	Emissions < 2.73 ton/month; < 26.3 ton/yr	Records
S1006	BAAQMD Condition # 9161 Part 1	Anti-Chip I VOC < 4.06 lb/gal; Anti-Chip II < 1.42 lb/gal; Repair Primer VOC < 4.63 lb/gal	Records
S1006	BAAQMD Condition # 9161 Part 2	Anti-Chip I Usage < 11,628 gal/yr, 1,209 gal/month Anti-Chip II Usage < 29,413 gal/yr, 3,059 gal/month Repair Primer Usage < 233 gal/yr, 24 gal/month; or compliance with Condition # 9161 Part 5	Records
S1006	BAAQMD Condition # 9161 Part 5	Emissions < 3.20 ton/month or < 30.76 TPY	Records
S1007	BAAQMD Condition # 9158 Part 8	Emissions < 1.31 ton/month; < 12.56 TPY	Records
S1008	BAAQMD Condition # 9163 Part 1	Primer VOC < 4.08 lb/gal Int. Color VOC < 4.46 lb/gal Others-Repair < 4.63 lb/gal Soft-Chip < 7.09 lb/gal	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1008	BAAQMD Condition # 9163 Part 2	Primer Usage < 62,129 gal/month, 6,461 gal/month Int. Color Usage < 26,973 gal/yr, 2,805 gal/month Others-Repair Usage < 233 gal/yr, 24 gal/month Soft-Chip Usage < 9,908 gal/yr, 1,030 gal/month; or compliance with Condition # 9163 Part 5	Records
S1008	BAAQMD Condition # 9163 Part 5	Emissions < 11.01 ton/month; < 105.9 TPY	Records
S1008	BAAQMD Condition # 9163 Part 10a	Temperature > 1400 oF, or compliance with Condition 9163 Part 17 and 18	Temperature
S1008	BAAQMD Condition # 9163 Part 10 b & c	Destruction Efficiency of Thermal Oxidizers > 98.5%, if VOC concentration > 1200 ppm as C1; or Destruction Efficiency > 95-98.5%, if VOC concentration > 500 ppm and < 1200 ppm (linearly)	Source Test
S1008	BAAQMD Condition # 9163 Part 12	VOC Reduction Efficiency of Activated Carbon System (A10082) > 90% wt	Source Test
S1009	BAAQMD Condition # 9158 Part 8	Emissions < 0.53 ton/month; < 5.09 TPY	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1010, S1017	BAAQMD Condition # 10011 Part 1	Repair Primer VOC < 4.63 lb/gal Solids (repair) VOC < 3.54 lb/gal Base Coat (repair) VOC < 4.79 lb/gal Clear Coat (repair) VOC < 4.12 lb/gal Solids (lacquer Repair) VOC < 6.32 lb/gal Base Coat (lacquer repair) VOC < 6.41 lb/gal Clear Coat (lacquer Repair) VOC < 6.30 lb/gal Adhesion Promoter VOC < 6.61 lb/gal Anti-Chip I VOC< 4.06 lb/gal Anti-Chip II VOC < 1.42 lb/gal	Records
S1010, S1017	BAAQMD Condition # 10011 Part 2	Repair Primer Usage < 837 gal/yr, 87 gal/month Solids (repair) Usage < 606 gal/yr, 63 gal/month Base Coat (repair) Usage < 857 gal/yr, 89 gal/month Clear Coat (repair) Usage < 1,665 gal/yr, 173 gal/month Solids (lacquer Repair) Usage < 691 gal/yr, 72 gal/month Base Coat (lacquer repair) Usage < 963 gal/yr, 100 gal/month Clear Coat (lacquer Repair) Usage < 1,576 gal/yr, 164 gal/month Adhesion Promoter Usage < 1,238 gal/yr, 128 gal/month Anti-Chip I Usage< 38 gal/yr, 4 gal/month Anti-Chip II Usage < 10 gal/yr, 1 gal/month; or compliance with Condition # 10011 Part 4	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1010, S1017	BAAQMD Condition # 10011 Part 4	Emissions < 2.38 ton/month; < 22.91 TPY	Records
S1014	BAAQMD Condition # 9164 Part 2a	Temperature > 1400 oF; Or compliance with Condition # 9165 Parts 12 & 13	Temperature
S1014	BAAQMD Condition # 9164 Part 2 b & c	Destruction Efficiency > 98% wt, if inlet VOC > 1200 ppm as C1; or Destruction Efficiency > 95-98% wt, if inlet VOC > 500-1200 ppm as C1	Source Test
S1014	BAAQMD Condition # 9164 Part 4	VOC Reduction Efficiency of Activated Carbon System > 90% wt	Source Test
S1014	BAAQMD Condition # 9164 Part 15	Solids VOC < 3.54 lb/gal Base Coat VOC < 4.79 lb/gal Clear Coat VOC < 4.12 lb/gal Other-Repair VOC < 4.63 lb/gal	Records
S1014	BAAQMD Condition # 9164 Part 16	Solids Usage < 26,927 gal/yr, 2,800 gal/month; Base Coat Usage < 53,211 gal/yr, 5,534 gal/month Clear Coat Usage < 70,094 gal/yr, 7,290 gal/month Other-Repair Usage < 349 gal/yr, 36 gal/month	Records
S1014	BAAQMD Condition # 9164 Part 19	Emissions < 13.6 ton/month; < 130.76 TPY	Records
S1015	BAAQMD Condition # 9158 Part 8	Emissions < 0.69 ton/month; < 6.59 TPY	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1018	BAAQMD Condition # 9710 Part 1	ASCA Chassis Blk VOC < 2.95 lb/gal	Records
S1018	BAAQMD Condition # 9710 Part 2	ASCA Chassis Blk Usage < 12,317 gal/yr; 1,281 gal/month	Records
S1018	BAAQMD Condition # 9710 Part 4	Emissions < 1.89 ton/month; < 18.17 TPY	Records
S1019	BAAQMD Condition # 9171 Part 2	Cavity Wax Usage < 15,406 gal/yr; 1,602 gal/month	Records
S1019	BAAQMD Condition # 9171 Part 5	Emissions < 0.58 ton/month; < 5.62 TPY	Records
S1020	BAAQMD Condition # 9172 Part 1	Solids VOC < 3.54 lb/gal Base Coat VOC < 4.79 lb/gal Clear Coat VOC < 4.12 lb/gal Lacquer VOC < 6.61 lb/gal	Records
S1020	BAAQMD Condition # 9172 Part 2	Solids Usage < 629 gal/yr, 65 gal/month Base Coat Usage < 893 gal/yr, 93 gal/month Clear Coat Usage < 1,734 gal/yr, 180 gal/month Lacquer Usage < 279 gal/yr, 29 gal/month	Records
S1020	BAAQMD Condition # 9712 Part 4	Emissions < 0.81 ton/month; < 7.75 TPY	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1021	BAAQMD Condition # 7364 Part 1	Underbody Wax VOC < 0.73 lb/gal Engine Wax VOC < 0.54 lb/gal Exterior Wax VOC < 1.50 lb/gal Hinge Wax VOC < 6.92 lb/gal	Records
S1021	BAAQMD Condition # 7364 Part 2	Underbody Wax Usage < 31,772 gal/yr, 3,304 gal/month; Engine Wax Usage < 1,954 gal/yr, 203 gal/month; Exterior Wax Usage < 24,635 gal/yr, 2,562 gal/month; Hinge Wax Usage < 2,566 gal/yr, 267 gal/month; or compliance with Condition # 7364 Part 5	Records
S1021	BAAQMD Condition # 7364 Part 5	Emissions < 2.46 ton/month; < 23.69 TPY	Records
S1050, S1051	BAAQMD Condition # 10578 Part 1	Emissions < 11.68 TPY	Records
S1050, S1051	BAAQMD Condition # 10578 Part 2	Tank Body Coating Usage < 24,598 gal/yr, Fastener Coating Usage < 9,048 gal/yr; or compliance with Condition # 10578 Part 1	Records
S1050, S1051	BAAQMD Condition # 10578 Part 7	Temperature > 1400 oF	Temperature
S1050, S1051	BAAQMD Condition # 10578 Part 8	Destruction Efficiency > 98.5% wt, if inlet VOC > 500 ppm as C1; or Destruction Efficiency > 95% wt, if inlet VOC < 500 ppm as C1; or VOC Outlet Concentration < 10 ppmv	Source Test

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1053	BAAQMD Condition # 9167 Part 1	EMISSIONS < 1.64 ton/month; < 15.79 TPY	Records
S1061, S1062	BAAQMD Condition # 10484 Part 1	Emissions < 13.22 TPY	Records
S1061, S1062	BAAQMD Condition # 10484 Part 2	Off-Line Coating Usage < 12,018 gal/yr, or compliance with Condition # 10484 Part 1	Records
S1061, S1062	BAAQMD Condition # 10484 Part 4	Off-Line Coating VOC < 2.2 lb/gal	Records
S1061, S1062	BAAQMD Condition # 10484 Part 6	VOC/axle < 0.087 lb/axle	Records
S1063, S1510	BAAQMD Condition # 10481 Part 9	POC < 22.32 TPY	Records
S1070, S1071	BAAQMD Condition # 10320 Part 42	Top Coat (Solventborne) < 37,157 gal/yr, Top Coat (Waterborne) < 16,317 gal/yr; or compliance with Condition # 10320 Part 41	Records
S1070, S1071	BAAQMD Condition # 10320 Part 19	Temperature < 1400 oF, or compliance with Condition # 10320 Part 26 & 27	Temperature
S1070, S1071	BAAQMD Condition # 10320 Part 20	Destruction Efficiency > 98.5% wt, if inlet VOC > 500 ppm as C1; or Destruction Efficiency > 95% wt, if inlet VOC < 500 ppm as C1; or VOC Outlet Concentration < 10 ppmv	Source Test

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1511	BAAQMD Condition # 13984 Part 1	Throughput < 283,000 gal/yr	Records
S1512	BAAQMD Condition # 13985 Part 1	Throughput ≤ 27,900 gal/yr	Records
S1803	BAAQMD Condition # 9175 Part 1	Bead Sealer VOC < 0.25 lb/gal	Records
S1803	BAAQMD Condition # 9175 Part 2	Bead Sealer Usage < 110,236 gal/yr, 11,465 gal/month, or compliance with Condition # 9175 Part 5	Records
S1803	BAAQMD Condition # 9175 Part 5	Emissions < 0.29 ton/month; < 2.76 TPY	Records
S1809	BAAQMD Condition # 7343 Part 1	Sealant Usage < 17,875 gal/yr, 1,859 gal/month; Adhesive Usage < 8,500 gal/yr, 884 gal/month; Various Usage < 117,166 gal/yr, 12,185 gal/month; or compliance with Condition # 7343 Part 3	Records
S1809	BAAQMD Condition # 7343 Part 3	Emissions < 74.66 TPY	Records
S1810	BAAQMD Condition # 9877 Part 1	Wipe & Clean-up Usage < 17,616 gal/yr, 1,832 gal/month; Cleaning Solvent Usage < 164,050 gal/yr, 17,061 gal/month, or Compliance with Condition # 9877 Part 3	Records
S1810	BAAQMD Condition # 9877 Part 3	Emissions < 28.3 ton/month; 272 TPY	Records

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1810	BAAQMD Condition # 9877 Part 4	Solvent Recovery > 65%, or Compliance with Condition # 9877 Part 3	Records
S1900	BAAQMD Condition # 18533 Part 1	Adhesive Usage < 13 gals/yr; or POC < 81 lbs/yr	Records
S3007, S3008, S3009, S3014-S3020, S3500, S3501, S3502, S3507, S3508, S3509, S3511-S3527, S3529-S3533, S3536, S3543, S3544, S3545, S3547-S3558, S3560, S3565-S3568 S30960,	BAAQMD Condition # 14205 Part 5	New Passenger Paint Shop* Emissions < 719.23 TPY	Records
S3007, S3008, S3009, S3014-S3020	BAAQMD Condition # 14205 Part 8	New Passenger Paint Shop* Manual touch-up or repair operations Usage < 6,906 gal/yr or Emissions < 19.91 TPY	Records
S3008, S3009, S3014, S3015, S3016, S3017	BAAQMD Condition # 14206 Part 1	Emissions < 130.94 tons/yr; or 16.36 tons/month, unless facility notifies District	Records
S3008, S3009, S3014, S3015, S3016, S3017	BAAQMD Condition # 14206 Part 2	Primer Usage < 60,869 gal/yr, 7,608 gal/month; Interior Color Usage < 32,435 gal/yr, 4054 gal/month; Black Out Usage < 8105 gal/yr, 1013 gal/month; Soft-Chip Usage < 8225 gal/yr, 1028 gal/month; or compliance with Part 1 of Condition # 14206	Records
S3008, S3009, S3014, S3015, S3016, S3017	BAAQMD Condition # 14206 Part 10	Minimum Temperature < 1400 oF, or compliance with Parts 2 and 3 of Condition # 14205	Temperature Monitor

VOC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S3008, S3009, S3014, S3015, S3016, S3017	BAAQMD Condition # 14206 Part 11	Destruction Efficiency > 98.5% wt, if inlet VOC > 500 ppm as C1; or Destruction Efficiency > 95% wt, if inlet VOC < 500 ppm as C1; or VOC Outlet Concentration < 10 ppmv	Source Test
S3019, S3020	BAAQMD Condition # 14209 Part 3	POC < 19.91 TPY or 2.49 ton/month or compliance with BAAQMD Condition # 14205 Part 5	Records
S3500, S3501, S3502, S30960	BAAQMD Condition # 14210 Part 1	Emissions < 321.03 TPY or 40.13 ton/month or compliance with Condition # 14205 Part 5	Records
S3500, S3501, S3502, S30960	BAAQMD Condition # 14210 Part 2	Collection/ Recovery Efficiency > 65% of Cleanup Solvent or compliance with Condition # 14210 Part 1	Records
S3600	BAAQMD Condition # 18907 Part 1	Polystrip 360 < 50 gal/yr, or compliance with Condition # 18907 Part 2	Records
	BAAQMD Condition # 18907 Part 2	C/NPOC emissions < 417 lbs/yr	Records

VOC Sources and Discussion:

All sources that are listed in the equipment list in Section II of the permit are VOC sources. Even the combustion sources emit small amounts of VOC.

Adequate recordkeeping requirements are in place to ensure compliance with all throughput limits for the coating and solvent cleaning sources at the facility, per Regulation 8-13-503 requirements, the Regulation 8-16-501 requirements, and per existing permit conditions.

However, to demonstrate compliance with the abatement efficiencies for the VOC abatement devices, additional monitoring requirements (such as source testing) were added to those permit conditions that had emission limits but no corresponding monitoring requirement. The District has determined that it is not feasible to accurately determine capture efficiency. As a result, the District has removed capture efficiency requirements and instead required mass balance determinations using source test data to verify good capture. A591, which is the carbon concentrator that concentrates the organics within the S59 Booth, does not have any limit or operating parameters in the existing permit conditions for S59. As a result, there is no monitoring requirement for A591.

There is no VOC limit for the combustion devices that are not abatement devices and so there is no VOC monitoring for these sources.

Toxics Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S1001, S1002, S1003, S1004, S1005, S1006, S1007, S1008, S1009, S1010, S1011, S1012, S1014, S1015, S1017, S1018, S1019, S1020, S1021, S1056, S1057	BAAQMD Condition # 9156 Part 6	(for Truck Vehicle Line*) Benzene < 157 lb/yr 1,4 Dioxane < 141.0 lb/yr Formaldehyde < 3342 lb/yr Methylene Chloride < 684.8 lb/yr Perchloroethylene < 1341.9 lb/yr Vinyl chloride < 2.8 lb/yr	Records

Toxic Sources and Discussion:

Adequate recordkeeping requirements are in place to ensure compliance with all toxic limit for truck line sources at the facility, per existing permit conditions.

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section VI of the permit.

IX. Permit Shield (Streamlining):

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit that identifies and justifies specific federally enforceable regulations and standards which the APCO has confirmed are not applicable to a source or group of sources, or (2) A provision in a major facility review permit that identifies and justifies specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting which are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

Although a permit shield was originally requested by the facility, the facility has since reconsidered their request. No permit shield is requested. Therefore, this permit has no streamlining.

D. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

E. Compliance Status:

Although two sources were indicated to be out of compliance in their original application. The Gasoline Dispensing Facility GDF (S806) was then still waiting for California Air Resources Board Certification and a District permit. The Truck Topcoat Booth #1 (S1014) was out of compliance destruction efficiency requirements because its thermal oxidizer was under repair to fix a leak in its heat exchanger. Since that time, those sources have since been brought into compliance. There are currently no sources out of compliance.

A September 26, 2001 office memorandum from Jim Guthrie, Director of Enforcement, to Bill deBoisblanc, Director, Permit Services, presents a review of the compliance record of the facility. The Enforcement Division staff has reviewed the records for NUMMI for the period between September 1, 2000 through September 1, 2001. This review was initiated as part of the District evaluation of an application by NUMMI for a Title V permit. During the period subject to review, activities known to the District include:

- Eight Notices of Violation were issued during this period. There were six violations of Regulation 2, Rule 1, Section 307 (permit conditions), one violation of Regulation 8, Rule 16 (solvent cleaners), and one violation Regulation 1, Section 523 (parametric monitors).
- Two alleged complaints of odors that were not confirmed.

- There were five reported breakdowns with associated excesses and two reported breakdowns with no associated excesses.
- NUMMI is not under a District variance or an Order of Abatement.

The Director of Enforcement has concluded that on-going compliance can be reasonably assured for this facility.

The owner certified that all equipment was operating in compliance on October 24, 1995. No non-compliance issues have been identified to date.

F. Differences between the Application and the Proposed Permit:

A permit shield was originally requested by the facility but the facility has since reconsidered their request. No permit shield is requested.

The Title V permit application was originally submitted on July 1996. Condition # 207 was the original permit condition for the original passenger line of NUMMI when they began operation in 1984. However, since that time, the majority of sources of the passenger line has been replaced by that of the new passenger paint shop (App # 25397). In addition, additional cold cleaners (App # 145) and a new Plastic Parts Adhesion Operation (App # 3742) were added. These new sources were added to the Title V permit, since the original Title V application was received on July 1996 and are listed below:

Source #	Source Names
3500-3502	Cold Cleaners
3503	Purge Thinner Tank
3505	Waste Solvent Tank
3507-3509	Paint Circulation Tanks
3511-3530	Paint Circulation Tanks
3531	SYSTEM #25 Paint Mix Tank
3532	SYSTEM #25 Paint Circulation Tank
3533	SYSTEM #26 Paint Circulation Tank
3536	SYSTEM #29 Paint Mix Tank
3537	SYSTEM #43 Paint Circulation Tank
3538	SYSTEM #43 Paint Circulation Tank
3543-3545	Paint Mix Tanks
3547-3558	Paint Mix Tanks
3560	SYSTEM #24 Paint Mix Tank
3565-3568	Paint Mix Tanks
3600	Cold Cleaner
10112	Recoat Sanding Booth
30960	General Cleaning and Painting Cleaning
1900	Plastic Parts Adhesion Operation

The sources that remain from the original passenger line (listed below) are still subject to Condition No. 207. As part of the Title V review process, Condition No. 207 was amended to remove reference to those sources that were removed (and subsequently replaced by those of the new passenger paint shop). In addition, permit condition language was amended to clarify the intent of the permit conditions. However, there were no changes to emissions limits made so as to require a modification of the permits for those sources. Daily and hourly limits were removed because they were derived from monthly limits and demonstrated by monthly recordkeeping. All changes made were administrative in nature and have no effect on emissions. Appendix A contains the text of the original Condition No. 207, and Appendix B contains the detailed summary of the administrative changes.

S2, Passenger Body Elpo Dip Tank,
S3, Passenger Body Elpo Oven
S60, Passenger Undercoating Booth
S61, Passenger Blackout Chassis Booth
S62, Passenger Fuel Tank Booth
S63, Passenger Protective Gas tank Oven
S71, Passenger Cavity Wax Booth
S72, Passenger Exterior, Underbody & Engine Wax Booth
S73, Passenger Exterior Wax Hot Air Dryer
S101, Spare Parts ELPO Tank
S102, Spare Parts ELPO Oven
S801, Stamping Plant Fugitive Solvent Emission
S803, Passenger Sealer Deck Line (Fugitive)
S804, Passenger Fugitive Repair Priming
S805, Body Shop Assembly Areas
S807, Anti-Chip & Wheelhouse PVC Booth
S808, Passenger/Truck Sealer Oven
S813, Passenger Fugitive Trial Application Area – Bead Sealer
S817, Passenger Anti-Chip Mix Tank
S818, Passenger Anti-Chip II Mix Tank

The other changes to conditions were to correct typos, grammar, or terminology to clarify intent. Basis identifiers were added to each condition part to clarify the basis for each condition part. Some conditions for the same source were merged together to form one combined condition. Notes explaining some of the amendments are indicated in the bolded and italicized brackets. Additions are indicated by underlines, while deletions are indicated by strikethroughs.

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APPENDIX A

ORIGINAL CONDITION NO. 207

APPENDIX A – Original Condition No. 207

Condition # 207

For S2, PASSENGER BODY ELPO DIP TANK,
S3, PASSENGER BODY ELPO OVEN
S28, FINAL REPAIR PRIME BOOTH,
S29, FINAL REPAIR PRIME OVEN
S60, UNDERCOATING BOOTH, S61,
S62, PASSENGER GAS TANK PAINT
S63, PASSENGER PROTECTIVE GAS TANK
S66, PASSENGER PAINT HOSPITAL (COLS C&D, 49 THRU 54)
S71, CAVITY WAX BOOTH
S72, EXTERIOR, UNDERBODY & ENGINE WAX BOOTH
S101, SMALL PARTS/CAB ELPO TANK
S102, SMALL PARTS/CAB ELPO OVEN
S801, STAMPING PLANT FUGITIVE MACHINING
S803, PASSENGER SEALER DECK LINE (FUGITIVE)
S804, PASSENGER FUGITIVE REPAIR PRIMING
S805, BODY SHOP ASSEMBLY AREAS
S807, ANTI-CHIP & WHEELHOUSE PVC BOOTH
S808, SEALER OVEN (THERMAL INCINERATOR ZONES 1,2,3,4,5)
S812, FUGITIVE APPLICATION OF PVC UNDERCOAT
S813, FUGITIVE TRIAL APPLICATION AREA – BEAD SEALER
S814, FUGITIVE TRIAL APPLICATION AREA FOR WHEELHOUSE, AND
S815, TRIAL APPLICATION:

The following conditions apply to the operation of the S2, S3, S28, S29, S60, S61, S62, S63, S66, S71, S72, S73, S101, S102, S801, S803, S804, S805, S807, S808, S812, S813, S814, and S815.

The corrective plan is an essential part of this document and is intended as a means for the applicant to correct occasional period exceedances, to stay within the yearly limits and thus to remain in compliance with District Regulations.

I. EMISSIONS

A. Total emissions of organic compounds, calculated on the basis of paint usage and not including any reduction due to oven burner incineration, shall not exceed 459.2 tons per model year (typically August 1, through July 31). Monthly and hourly usage rates shall not exceed the limits expressed in Table I.

The applicant shall attempt to prevent total actual emissions of organic compounds, including reductions due to oven burner incineration, from exceeding 250.5 tons per model year. (basis: Cumulative Increase)

B. Fugitive emissions calculated from coating usage inventory from all materials used in the body and assembly areas may not exceed 69 tons per year model year nor 6.8 tons per calendar month. (basis: Cumulative Increase)

C. If the above limits are exceeded, then the requirements of Section IX of these conditions shall apply. (basis: Cumulative Increase)

D. Emissions shall be determined by calculation, using material use rates and VOC content, unless other methods are specified or approved in writing by the APCO. (basis: Regulation 2-1-403)

II. MATERIAL USAGE LIMITATIONS

A. Usage and VOC content of all topcoats, urethane coatings, primers, clean-up solvents, repair primers, and any other VOC containing materials used in paint shop operations must meet the requirements specified in Table I. The applicant shall not at any time exceed the annual, monthly nor the hourly usage limits specified in Table I. (basis: Regulation 2-1-403)

B. For the purposes of determining compliance with emissions and/or usage limits, a year is defined as a twelve month consecutive period in which NUMMI produces a vehicle model (typically August 1 thru July 31); a month is defined as a calendar month. (basis: Regulation 2-1-403)

C. However, the gallon per hour usage limits shall not apply if the total operating hours during the month are less than 100. (basis: Regulation 2-1-403)

D. The applicant may petition the APCO to accept alternate usage and/or VOC content limits equivalent to the specified values. (basis: Regulation 2-1-403)

E. The non-metallic, high solids (NMHS) enamel usage may increase above the specified usage limit provided the corresponding base coat/clear coat usage decreases proportionally, based on emissions, below the specified usage limits. Also, the base coat and/or clear coat usage may increase above the specified usage limit provided the corresponding NMHS enamel usage decreases proportionally, based on emissions, below the specified usage limit. (basis: Regulation 2-1-403)

F. If District Regulation 8 Rule 13, or any District rule or regulation, specifies more stringent requirements that those listed in Table I, or other parts of these conditions, then the more stringent requirements shall apply, and the total shall be adjusted downward as necessary. (basis: Regulation 2-1-403)

G. To allow for future Passenger Line operating flexibility without falling into the category of a "major modification" under pending provisions of Title V, changes to limits on

material usage and/or VOC contents and relocation of coatings between sources of the passenger line are allowed, if all of the following criteria are met:

a. Changes do not result in overall VOC emissions exceeding the limit specified in Condition I.
b. Changes are in compliance with all applicable District regulations, including the Best Available Control Technology (BACT) and offsets requirements of Regulation 2-2-301 and 2-2-302.
c. Changes are not implemented until written approval (i.e., Change of Conditions) is obtained from the APCO. (basis: Regulation 2-1-403)

III. EMISSION CONTROL EQUIPMENT

A. INCINERATING OVEN BURNERS

1. Incinerating Oven Burners shall be maintained and operated on the following sources:

Sources	Description	Destruction Efficiency:
S102	Small Parts ELPO Oven	60%

(basis: Cumulative Increase)

2. The applicant shall conduct a source test of the incinerators within the first six months of operation and annually thereafter. The first source test shall, as a minimum, measure flame temperature in the incinerator stacks, concentration of organic materials in the stack and sufficient additional information that percent reduction in organic emissions in the incinerators can be determined. (basis: Cumulative Increase)

B. SEALER OVEN THERMAL INCINERATION

1. All volatile organic compound (VOC) emissions from S 808, Sealer Oven, shall be abated by thermal incineration. The capture efficiency shall be no less than 90% by weight.
   a. In lieu of capture efficiency (CE) demonstration, the net mass emissions of POC shall be determined for the sources listed above with their respective coating sources combined. To determine the net mass emissions, the following shall be calculated and/or measured:
   b. Calculated POC emissions on a pounds per unit basis [A] shall be determined by multiplying the annualized coating usage with the POC content and dividing by the annualized production rate.
   c. Measured POC emissions to each booth and oven Thermal Oxidizer (averaged, using the data obtained from at least 3 current source tests) shall be determined using District approved source testing methods [B].
   d. Measured POC emissions from each booth and oven Thermal Oxidizer and carbon concentrator (averaged, using the data obtained from at least 3 current

source tests) shall be determined using District approved source testing methods [C].

e. [B] and [C] shall each be divided by the production rate measured during the source test yielding a pounds per unit bas is. [B] and [C] shall be each multiplied by the annualized units per hour and divided by the source test measured units per hour rate.
f. The net mass emissions shall be calculated by subtracting the measured POC emissions from the inlet from the calculated POC emissions and adding the measured POC emissions from the outlet [A-B+C].
g. The determined value [A-B+C] shall be multiplied by the actual, annual production rate.
h. Within 60 days of the above described source testing, a report documenting results shall be provided to the District. This 60 day period may be extended to 90 days, if NUMMI can demonstrate to the satisfaction of the APCO that the additional time is required. If the source testing indicates any violation of the permit conditions (total mass emission greater than emission limits for coating line (booth(s) and oven(s) combined), NUMMI shall report such violation to the permit engineer and the Director of Enforcement in the report.

(basis: BACT)

2. Oven, cooling tunnel and setting zone emissions shall be controlled by thermal incineration with a minimum retention time of 0.5 seconds. The thermal incinerators shall be capable of achieving the following level of control:
   a. In no event shall the Thermal Oxidizer (A808) temperature be less than 1400^{o}F, unless NUMMI can demonstrate to the satisfaction of the APCO that the permit conditions can be met with the Thermal Oxidizer (A808) operating at a lower temperature. The minimal operating temperature for the Thermal Oxidizer (A808) shall be 1400 degrees F. The Thermal Oxidizer (A3008) may operate below 1400 degrees F only if the temperature excursion parameters set forth in Parts 6 and 7 of this condition are complied with.
   b. The VOC destruction efficiency of the Thermal Oxidizer (A808) shall be maintained at a minimum of 98.5% by weight, whenever the inlet concentration of VOC to the Thermal Oxidizer (A 808) is equal to or greater than 500 ppmv, as measured as methane. Below a concentration of 500 ppmv, the precursor organic destruction efficiency shall be kept at a minimum of 95% by weight or total non-methane organic carbon emissions from the outlet of the Thermal Oxidizer (A808) shall be 10 ppm by volume or less.

   (basis: BACT)

3. The temperature at each incinerator shall be recorded using chart (or digital) recorders. (basis: BACT)

4. The incinerators shall be source tested on an annual basis, unless a different schedule is approved, and maintained on a regular basis. Records of the source test results and a maintenance schedule shall be kept. (basis: BACT)

5. All records required in Conditions 3 and 4 shall be kept and made available for District inspection for a period of 12 months 5 years following the date a record was made. (basis: BACT)

6. Within 30 day of start-up, a source test shall be performed in accordance with the District's Manual of Procedures. The results of the source test shall be submitted to the District within 60 days following the completion of the source test. This periods may be extended to 90 days, if NUMMI demonstrates to the satisfaction of APCO that the additional time is required. (basis: BACT)

7. The respective minimum temperature and abatement efficiency requirements for Thermal Oxidizers located at NUMMI shall not apply during an "Allowable Temperature Excursion" below the minimum temperature requirement, provided that the controller set temperature is at or above the minimum temperature requirement. An Allowable Temperature Excursion is one of the following:
   a. A temperature excursion not exceeding 20 degrees F; or
   b. A temperature excursion period or periods aggregating less than or equal to 15 minutes in any hour; or
   c. A temperature excursion greater than 15 minutes but less than 3 hours in duration, provided that all of the following are satisfied:
      i. There are no more than 2 excursions per facility (Plant No. 1438) per calendar day;
      ii. There are no more than 2 excursions per abatement device per calendar month; and
      iii. There are no more than 5 excursions per facility (Plant No. 1438) per calendar month. (basis: Regulation 2-1-403)

8. NUMMI shall keep sufficient records to demonstrate that they meet all qualifying criteria for Allowable Temperature Excursions, including but not limited to the following:
   a. Starting date and time, and the duration of each Allowable Temperature Excursion;
   b. Minimum temperature during each Allowable Temperature Excursion;
   c. Number of Allowable Temperature Excursions (>15 minutes) per abatement device per calendar month;
   d. Total number of Allowable Temperature Excursions (> 15 minutes) for the entire facility per calendar month. A summary of these records shall be included in NUMMI's monthly report to the District. To satisfy the NSPS requirement of 40CFR60, Subpart MM, a negative declaration is

also required in NUMMI's monthly report if there are no temperature excursions.
(basis: Regulation 2-1-403)

9. The District reserves the right to revise or revoke condition 6 and 7 in the future if source operations change significantly such that the basis for granting this condition is no longer valid. (basis: Regulation 2-1-403)

PARTICULATE ABATEMENT

1. The pressure drop across the A3, A4, A21, A22, and A101 shall not be less than 1 inch of water or exceed 5 inches of water. (basis: Regulation 2-6-409.2)

2. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made readily available to District staff upon request. (basis: Regulation 2-6-409.2)

RECORD KEEPING AND REPORTING

1. For all coatings and solvents used on passenger car line operations, monthly records of material usage must be kept for five years. A monthly report including material usage and a summary of total actual organic emissions from all passenger car line operations shall be submitted to the District within 30 days of the end of each calendar month. If the accumulated organic emissions for any portion of this specified 12-month period exceed the annual usage limit prorated for that portion, the District shall be notified in writing within 30 days as to what steps will be taken to assure that the limit of 1,582.6 tons per model year will not be exceeded. The format of the monthly report shall be submitted to the District prior to start-up for approval by the APCO. (basis: Regulation 2-1-403)

2. The temperature chart (or digital) recorder periods of in operation greater than 24 hours shall be reported to the District's Enforcement Division within the following working day by telephone, followed by written documentation of recorder downtime and resumption of operation, as part of NUMMI's monthly report to the District's Permits and Enforcement Division. Until the temperature chart (or digital) recorder is in correct operation, the temperature shall be manually recorded every two hours. Adequate proof of expeditious repair shall be furnished to the APCO for downtime in excess of fifteen consecutive days. (basis: Regulation 2-1-403)

V. SAMPLING

Samples of coating materials shall be made available to the District upon request by the APCO or his representative. (basis: Regulation 2-1-403)

VI. ENFORCEMENT

Violation by the applicant of any of the conditions set forth in this permit shall subject the company to appropriate enforcement action under Chapter 4 of Part 4 of Division 26 of the California Health and Safety Code. (basis: Regulation 2-1-403)

VII. MISCELLANEOUS

A. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of this Permit to Operate shall at all times be maintained in good working order and be operated with due regard for the goal of complying with the conditions of this permit and with all applicable District regulations. (basis: Regulation 2-1-403)

B. For the purpose of these conditions, any reference to "the applicant" shall be deemed to also refer to the applicant's agents, contractors, subcontractors, assignees, or joint venture partners, as well as to any party brought in to operate the proposed facility, as appropriate. (basis: Regulation 2-1-403)

C. The APCO or his representatives shall have the right to inspect and audit all records required to be maintained by Section IV above, and any other records in the applicant's possession that may indicate the nature or quantity of emissions from the proposed facility. (basis: Regulation 2-1-403)

D. The APCO or his representatives shall have access to any portion of the plant to conduct source tests or inspections without prior approval. (basis: Regulation 2-1-403)

E. Nothing in these conditions shall be construed to allow the violation of any law or of any rule or regulation of the Bay Area Air Quality Management District, the State of California or the United States Environmental Protection Agency. (basis: Regulation 2-1-403)

F. Minimal Voltage Requirements:
   a) The following minimum voltages shall be maintained as measured at the power supply:
      70KV - Prime Bells, Topcoat Bells (Solid & Clear)
      50KV - Topcoat Bells (Basecoat)
      25KV - Topcoat REA
   b) Once implemented, but no later than commencement of bumper coating operations, the following minimum voltages shall be maintained for manual coating operations in the Topcoat and Prime Booths, as measured at the electrostatic hand held spray gun:

30KV - Prime, Topcoat, Interior (excludes Blackout)

c) Handheld electrostatic spray gun application of the topcoat/interior blackout painting operation is not required.

Voltage may be below, or be shut off, for the correction of operational problems or equipment failure for a period of up to 3 days. For periods exceeding 3 days the District must be notified within 24 hours of the 3rd day. Within 7 days of the 3rd day a schedule of compliance and corrective action must be submitted to the District. Excess emissions for the entire period must be calculated and applied to the Passenger Line emission total. (basis: Regulation 2-1-403)

VIII. SEVERABILITY

The provisions of these conditions are intended to be severable, and, if any individual condition or provision hereof is held to be invalid by order of the Hearing Board of the Bay Area Air Quality Management District, by order of any court competent jurisdiction, or for any other reason, the remainder of these conditions shall not be affected thereby. (basis: Regulation 2-1-403)

IX. CORRECTIVE PLAN

If any of the annual, monthly or hourly limits of Section I or Section II (Table I) are exceeded, the applicant shall implement abatement measures to prevent the recurrence of the type of incident which caused the excess. This plan is intended to provide a mechanism for bringing the applicant back into compliance should a temporary exceedance occur. (basis: Regulation 2-1-403)

A. If an exceedance of monthly limits for coatings and solvent usage from the passenger car line as specified in Table I becomes apparent (see Section IV), the applicant shall notify the District and will include a Corrective Plan with the monthly report. (basis: Regulation 2-1-403)

B. The corrective Plan will include a commitment by the applicant to come into compliance in such a fashion that the amount of the exceedance shall be made up within the three-month period following such exceedance. For these purposes the exceedance will be calculated on a plant-wide basis, and an excess in one parameter can be balanced by an equivalent reduction in another (see Table I). (basis: Regulation 2-1-403)

C. All steps to accomplish emission reductions of (B) will indicate the time periods during which the corrective action will become effective. (basis: Regulation 2-1-403)

D. If a second or subsequent monthly exceedance occurs in any model year to the same monthly limit, except for the month immediately following the exceedance, the annual total limit will be reduced for only the following year by one-half the amount of the second or subsequent exceedance. (basis: Regulation 2-1-403)

E. If, at the end of a model year, the total emission (usage) exceeds the yearly totals given in Table I, the yearly totals for only the following year will be reduced by an amount of one-half of the exceedances for the year. (basis: Regulation 2-1-403)

F. Correcting an exceedance may be accomplished by the following methods:
1. reducing the production rate,
2. altering the paint composition,
3. improvement of transfer efficiencies,
4. installation of abatement devices,
5. any other method approved by the APCO. (basis: Regulation 2-1-403)

Table I

Passenger Line

Type of Material	Material	Material Usage Limits Usage Rate(4) Gal/Year	Gal/Mon(1)
Primer	Passenger Body Elpo	221,334	21,725
	Small Parts Elpo	28,400	3,156
	Anti-Chip II	30,009	2,946
	Anti-Chip IB	13,786	1,353
	Blackout Chassis	11,990	1,177
	Undercoating	328,967	32,290
	Final Repair(6)	637	63
	Protective Gas Tank	40,214	3,947
Fugitive	Paint Shop Sealant	87,179	10,753
	Repair Primer(6)	1,750	172
	Cavity Wax(9)	5,326	523
	Underbody Wax(9)	10,096	991
	Hinge(9)	1,962	193
	Engine Wax(9)	1,538	151
	Exterior Wax(9)	7,900	776
	All Materials Used In Body & Assembly Areas	---	---
	Underbody Blackout	3,642	357

* * * * * *

Type of Material	Material	Usage Rate(4) Gal/Day(7)	Gal/Hr(2)
Primer	Passenger Body Elpo	---	47.7
	Small Parts Elpo	---	6.3
	Anti-Chip II	---	7.2
	Anti-Chip IB	---	3.3
	Blackout Chassis	---	2.9
	Undercoating	1,344	78.7
	Final Repair(6)	---	.2
	Protective Gas Tank	---	9.6
Fugitive	Paint Shop Sealant	---	26.2
	Repair Primer(6)	---	.5
	Cavity Wax(9)	22	1.3
	Underbody Wax(9)	41	2.4
	Hinge(9)	8	0.5
	Engine Wax(9)	6	0.4
	Exterior Wax(9)	31	1.7
	All Materials Used In Body & Assembly Areas	---	---
	Underbody Blackout	---	0.9

* * * * *

Type of Material	(7) Material	VOC Content(4) LBS VOC/GAL(8)
Primer	Passenger Body Elpo	1.21
	Small Parts Elpo	1.21
	Anti-Chip II	2.09
	Anti-Chip IB	4.06
	Blackout Chassis	3.02
	Undercoating	.75
	Final Repair(6)	6.41
	Protective Gas Tank	0.95
Fugitive	Paint Shop Sealant	0.39
	Repair Primer(6)	5.83
	Cavity Wax(9)	0.94
	Underbody Wax(9)	1.04
	Hinge(9)	5.01
	Engine Wax(9)	0.59
	Exterior Wax(9)	1.50
	All Materials Used In Body & Assembly Areas	---
	Underbody Blackout	3.02

* * * * *

Type of Material	Material	Calculated Emissions Tons/yr(3)	Controlled Emissions Tons/yr
Primer	Passenger Body Elpo	133.9	66.4
	Small Parts Elpo	17.2	6.9
	Anti-Chip II	31.4	7.2
	Anti-Chip IB	28.0	22.0
	Blackout Chassis	18.1	n/a
	Undercoating	93.8	14.5
	Final Repair(6)	2.0	n/a
	Protective Gas Tank	19.1	9.3
Fugitive	Paint Shop Sealant	17.0	5.4
	Repair Primer(6)	5.1	n/a
	Cavity Wax(9)	2.5	n/a
	Underbody Wax(9)	5.3	n/a
	Hinge(9)	4.9	n/a
	Engine Wax(9)	.5	n/a
	Exterior Wax(9)	5.9	n/a
	All Materials Used In Body & Assembly Areas	69.0	n/a
	Underbody Blackout	5.5	n/a
	TOTAL	459.2	250.5

Table I Notes

1. Gallons per month limits are based on a 31-day calendar month. The limits shall be prorated for months with less than 31 calendar days.
2. Gallons per hour usage values shall be determined by dividing monthly usage amounts by total operating hours during that month.
3. Calculated emissions are based on material usage and do not include reductions due to control methods.
4. All material usage and VOC contents are expressed excluding water.
5. NMHS refers to Non-metallic high solids enamel.
6. The final Repair and Repair Primer sections include prime and color touch-up coatings.
7. Gallons per day usage values shall be determined by dividing monthly usage amounts by total operating days during that month.
8. Values that will be listed in future revisions to this table will represent maximum limits.
9. The total VOC emissions due to the wax booths and oven S71, S72, and S73, shall not exceed 19 tons/year and 150 pounds/day. (last modified for Application No. ~~25397~~ 16480)

APPENDIX B

SUMMARY OF CHANGES TABLE FOR CONDITION # 207

APPENDIX B – Summary of Changes Table for Condition # 207

Opening Section List of Sources

S2- Passenger Body ELPO Dip Tank S3- Passenger Body Elpo Oven S28- Final Repair Prime Booth S29- Final Repair Prime Oven S60- Undercoating Booth S-61- Blackout Chassis Booth S62- Passenger Gas Tank Paint S63- Passenger Protective gas tank S66- Passenger paint hospital (Cols C&D- 49 thru 54) S71- Cavity Wax Booth S72- Exterior- Underbody & Engine Wax Booth S73 - Passenger Exterior Wax Hot Air Dryer S101- Small Parts/CAB ELPO Tank S102- Small Parts/CAB ELPO Oven S801- Stamping Plant Fugitive Machining S802 - Stamping Plant Fugitive Machining S803- Passenger Sealer Deck Line (Fugitive) S804- Passenger Fugitive Repair Priming S805- Body Shop Assembly Areas S807- Anti-Chip & Wheelhouse PVC Booth S808- Sealer Oven (Thermal Incinerator Zones 1-2-3-4-5) S812- Fugitive Application of PVC Undercoat S813- Fugitive Trial Application Area – Bead Sealer S814- Fugitive Trial Application Area for Wheelhouse- S815- Trial Application S817 - Passenger Anti-Chip Mix Tank S818 - Passenger Anti-Chip II Mix Tank	**Removed following non-existing sources:** S28 - Final Repair Prime Booth S29 - Final Repair Prime Oven S66 - Passenger Paint Hospital (Cols C&D, 49 thru 54) S812 – Fugitive Trial Application Area – Bead Sealer S814 – Fugitive Trial Application for Wheelhouse S815 – Trial Application Renamed the following sources to clarify descriptions: S60 – Passenger Undercoating Booth S61 – Passenger Blackout Chassis Booth S62- Passenger Gas Tank Paint Booth S63- Passenger Protective gas tank Oven S71 – Passenger Cavity Wax Booth S72 – Passenger Exterior, Underbody & Engine Wax Booth S73 – Passenger Exterior Wax Hot Air Dryer S101 - Spare Parts ELPO Tank S102 – Spare Parts ELPO Oven S801 – Stamping Plant Fugitive Solvent Emissions S802 - Stamping Plant Fugitive Machining S808 – Passenger/Truck Sealer Oven S813- Passenger Fugitive Trial Application Area – Bead Sealer S817, Passenger Anti-Chip Mix Tank S818, Passenger Anti-Chip II Mix Tank

Section 1 – Emissions Limitations

(a). Total emissions of organic compounds, calculated on the basis of paint usage and not including any reduction due to oven burner incineration, shall not exceed 459.2 tons per model year (typically August 1, through July 31). Monthly and hourly usage rates shall not exceed the limits expressed in Table I.	(a). Total emissions for the sources listed for Condition 207 not including any reduction due to emission abatement devices and activities, shall not exceed 459.2 tons during any consecutive 12-month period. **Notes**: • Remove references to monthly and hourly usage rates and to Table I • Changed model year to "any consecutive 12-month period." • Remove reference to reduction due to oven burner incineration and replaced oven burner incineration with "emission abatement devices and activities"
The applicant shall attempt to prevent total actual emissions of organic compounds, including reductions due to oven burner incineration, from exceeding 250.5 tons per model year	attempt to prevent total actual emissions of organic compounds, including reductions due to abatement measures, from exceeding 250.5 tons per year. (basis: Cumulative Increase) • Replaced word applicant with NUMMI • Delete the word model to make statement read "250.5 tons per year" instead of 250.5 tons per model year. • Remove reference to "reduction due to oven burner incineration" and replace it with "reduction due to abatement measures".

Section 1 – Emissions Limitations cont.

B. Fugitive emissions calculated from coating usage inventory from all materials used in the body and assembly areas may not exceed 69 tons per year model year nor 6.8 tons per calendar month. (basis: Cumulative Increase)	(b). Fugitive emissions shall be calculated, based upon materials used and the materials corresponding VOC content. Total fugitive emissions from the body weld and assembly areas, S-805, shall not exceed 69 tons during any consecutive 12-month period nor 6.8 tons per calendar month. (basis: Cumulative Increase) Notes: • Reference Source 805, body shop and assembly areas as fugitive emission source. • Change coating usage to material used and calculations bases upon the materials corresponding VOC content. • Changed model year to any consecutive 12-month period
C. If the above limits are exceeded, then the requirements of Section IX of these conditions shall apply. (basis: Cumulative Increase)	Deleted this section. This is addressed in the first paragraph of Section 10, corrective action plan. This paragraph states "If any of the annual or monthly material usage limits are exceeded, NUMMI shall implement abatement measures to prevent the recurrence of the type of incident which caused the excess. This plan is intended to provide a mechanism for bringing NUMMI back into compliance should a temporary exceedance occur. (basis: Regulation 2-1-403)"

Section 2 – Material Usage Limitation

Usage and VOC content of all topcoats, urethane coatings, primers, clean-up solvents, repair primers, and any other VOC containing materials used in paint shop operations must meet the requirements specified in Table I. The applicant shall not at any time exceed the annual, monthly nor the hourly usage limits specified in Table I. For the purposes of determining compliance with emissions and/or usage limits, a year is defined as a twelve month consecutive period in which NUMMI produces a vehicle model (typically August 1 thru July 31); a month is defined as a calendar month. However, the gallon per hour usage limits shall not apply if the total operating hours during the month are less than 100. The applicant may petition the APCO to accept alternate usage and/or VOC content limits equivalent to the specified values.	Replace entire section with: "(a) Material usage can not exceed the values listed in the VOC Material Content and Use Table (Table 1)." **Notes:** • Removed references to hourly and daily limits. • Replaced Table I with consolidated VOC Material Content and Use Table. • Removed reference to Table I. • Replaced "The applicant may petition the APCO to accept alternate usage and/or VOC content limits equivalent to the specified values" with "(b) NUMMI may petition the APCO to accept alternative usage and/or VOC content limits equivalent to the specified values in VOC Material Content and Use Table. (basis: Regulation 2-1-403)"
The non-metallic, high solids (NMHS) enamel usage may increase above the specified limit provided the corresponding base coat/clear coat usage decreases proportionally, based on emission, below the specified usage limits. Also, the base coat and/or clear coat usage may increase above the specified usage limit provided the corresponding NMHS enamel usage decreases proportionally, based on emissions, below the specified usage limit. (basis: Regulation 2-1-403).	Section deleted. **Notes:** • None of these activities are done at any of the sources covered by this condition.

Section 2 – Material Usage Limitation cont.

If District Regulation 8 Rule 13, or any District rule or regulation, specifies more stringent requirements than those listed in Table I, or other parts of these conditions, then the more stringent requirements shall apply, and the total shall be adjusted downward as necessary.	(c) If District Regulation 8 Rule 13, or any District rule or regulation, specifies more stringent requirements that those listed in the VOC Material Content and Use Table, or other parts of these conditions, then the more stringent requirements shall apply, and any adjustment necessary to achieve compliance with these requirement will be made by NUMMI as expeditiously as possible. (basis: Regulation 2-1-403) **Notes:** • Replace reference to Table I with reference to VOC Material Content and Use Table.
To allow for future Passenger Line operating flexibility without falling into the category of a "major modification" under pending provisions of Title V, changes to limits on material usage and/or VOC contents and relocation of coatings between sources of the passenger line are allowed, if all of the following criteria are met: a. Changes do not result in overall VOC emissions exceeding the limit specified in Condition I. b. Changes are in compliance with all applicable District regulations, including Best Available Control Technology (BACT) and offsets requirements of Regulation 2-2-301 and 2-2-302 c. Changes are not implemented until written approval (i.e., Change of Conditions) is obtained from the APCO. (basis: Regulation 2-1-403)	• This section was removed because Regulation 2-5 now exists and defines a major modification.

Section 3 – Emission Control Equipment

General Condition Statement (None exist in current draft of condition).	Emission abatement equipment must be operating during periods of passenger vehicle or passenger spare/small parts production and during clean-up operations following periods of production. Abatement equipment is not required to operate during periods when VOC emissions are not emitted. **Notes:** • Added this introductory statement to clarify that during periods of non-productivity, abatement equipment does not have to be operating. This also ties in with the allowable temperature excursions because a literal interpretation of the requirement could be made that abatement equipment must operate during periods of non-productivity. • This could also be interpreted as an allowable temperature excursion.
A. INCINERATING OVEN BURNERS (basis: Cumulative Increase) 1. Incinerating Oven Burners shall be maintained and operated on the following sources: Sources Description Destruction Efficiency: ------ ---------- ---------- S102 Small Parts ELPO Oven 60% (basis: Cumulative Increase)	A. SPARE PARTS ELPO OVEN CATALYTIC THERMAL OXIDIZER (A102) Catalytic thermal oxidizer (A102) shall be maintained and operated for S102, Spare Parts ELPO Oven, with a minimum destruct efficiency of 60%. The minimum destruction/operating temperature shall be 800 ^{o}F. The destruction temperature shall be continuously recorded using chart (or digital) recorders. **Notes:** • Removed reference to Incinerating Oven Burners. Replaced with more accurate description of Catalytic Thermal Oxidizer. • Changed source name to "Spare Parts ELPO OVEN" • Include abatement device number with referenced source number. • Clarify minimum destruct/operating temperature for abatement device. • Established subsection A of Part 3 of Condition 207 to specifically address the Spare Parts ELPO Oven.

Section 3 – Emission Control Equipment cont.

B. The applicant shall conduct a source test of the incinerators within the first six months of operation and annually thereafter. The first source test shall, as a minimum, measure flame temperature in the incinerator stacks, concentration of organic materials in the stack and sufficient additional information that percent reduction in organic emissions in the incinerators can be determined. (basis: Cumulative Increase)	NUMMI shall conduct a source test for this abatement system, once per calendar year. The source test shall measure both the inlet and outlet concentrations of the non-methane hydrocarbons being abated by the system. Within 60 days of the above described source test, a report documenting results shall be provided to the District. This 60 day period may be extended to 90 days, if NUMMI can demonstrate to the satisfaction of the APCO that the additional time is required. If the source testing indicates any violation of the permit conditions for Condition 207, NUMMI shall report such violation to the permit engineer and the Director of Enforcement in the report. (basis: BACT) (basis: Cumulative Increase) **Notes:** • Removed reference to original source test. • Replaced phrase "annually" with "once per calendar year". • Added the second paragraph for source test reporting to remain consistent with all source testing requirements established in the PTO. • Changed the source testing parameters for one consistent with a catalytic thermal oxidizer as opposed to a burner.
SEALER OVEN THERMAL INCINERATION (basis: BACT) B. All volatile organic compound (VOC) emissions from S 808, Sealer Oven, shall be abated by thermal incineration. The capture efficiency shall be no less than 90% by weight.	B. SEALER OVEN THERMAL OXIDIZER 1. All volatile organic compound (VOC) emissions from S 808, Passenger Sealer Oven, shall be abated by thermal incineration. **Notes:** • Replaced "Incineration" with Oxidizer.

Section 3 – Emission Control Equipment cont.

Oven cooling tunnel section (4): The incinerators shall be source tested on an annual basis, unless a different schedule is approved, and maintained on a regular basis. Records of the source test results and a maintenance schedule shall be kept. (basis: BACT) (page 146) Oven cooling tunnel section (5). All records required in Conditions 3 and 4 shall be kept and made available for District inspection for a period of 12 months 5 years following the date a record was made. (basis: BACT) Oven cooling tunnel section (6). Within 30 day of start-up, a source test shall be performed in accordance with the District's Manual of Procedures. The results of the source test shall be submitted to the District within 60 days following the completion of the source test. This periods may be extended to 90 days, if NUMMI demonstrates to the satisfaction of APCO that the additional time is required.	The thermal oxidizer shall be source tested once per calendar year, unless a different schedule is approved, and maintained on a regular basis. Records of the source test results and a maintenance schedule shall be kept. (basis: BACT) **Notes:** • Clarified that source testing will be conducted once per calendar year. • Delete section (5) of Oven cooling tunnel section. Replace with statement that all records required by Condition 207 will be kept and made available for District inspection for a period of 5 years. This is in beginning of Section 5 Record Keeping and Reporting. • Removed all references to source test startup per section (6) of oven cooling tunnel. • Removed all references to allowable temperature excursions and made it into a separate section.
PARTICULATE ABATEMENT 1. The pressure drop across the A3, A4, A21, A22, and A101 shall not be less than 1 inch of water or exceed 5 inches of water. (basis: Regulation 2-6-409.2) 2. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made readily available to District staff upon request. (basis: Regulation 2-6-409.2)	**Note:** Deleted section. Not applicable to existing sources and operations.

Section 4 – Allowable Temperature Excursions

	New Section Summary • Specifies minimum destruct/operating temperature of the Thermal Oxidizer (A308) is 1400 ^{o}F. • No other changes are made to the Allowable Temperature Excursion provisions.

Section 5 – Record Keeping and Reporting

1. For all coatings and solvents used on passenger car line operations, monthly records of material usage must be kept for five years. A monthly report including material usage and a summary of total actual organic emissions from all passenger car line operations shall be submitted to the District within 30 days of the end of each calendar month. If the accumulated organic emissions for any portion of this specified 12-month period exceed the annual usage limit prorated for that portion, the District shall be notified in writing within 30 days as to what steps will be taken to assure that the limit of 1,582.6 tons per model year will not be exceeded. The format of the monthly report shall be submitted to the District prior to start-up for approval by the APCO. (basis: Regulation 2-1-403)	a. All records required by Condition 207 shall be kept and made available for District inspection for a period of 5 years following the date a record was made. (basis: BACT) b. For all paints, primers, sealants, coatings, solvents and miscellaneous cleaning materials used for the sources listed for Condition 207, monthly records of material usage must be kept for five years. A monthly report including material usage and a summary of total actual organic emissions from all sources applicable to Condition 207 shall be submitted to the District within 30 days of the end of each calendar month. If the accumulated organic emissions for any month exceeds 38.2 tons, the District shall be notified in writing within 30 days as to what steps will be taken to assure that the limit of 459.2 tons per year will not be exceeded. (basis: Cumulative Increase) Notes: • Inserted reference specifying this section is applicable to all records required for Condition 207. • Changed initial reference from all coatings and solvents to "all paints, primers, sealants, coatings, solvents and miscellaneous cleaning materials". This was done for consistency throughout the condition. • Delete reference to passenger car line operations. This condition covers sources not included in the passenger line operations. • Changed the 1,582 tons per model year emission limit to 459.2 toms per year. This is consistent with the 12 consecutive month clauses and the emission limit established in Part 1 section (a). • Changed usage limit to annual emission limit.

Section 5 – Record Keeping and Reporting cont.

2. The temperature chart (or digital) recorder periods of in operation greater than 24 hours shall be reported to the District's Enforcement Division within the following working day by telephone, followed by written documentation of recorder downtime and resumption of operation, as part of NUMMI's monthly report to the District's Permits and Enforcement Division. Until the temperature chart (or digital) recorder is in correct operation, the temperature shall be manually recorded every two hours. Adequate proof of expeditious repair shall be furnished to the APCO for downtime in excess of fifteen consecutive days. (basis: Regulation 2-1-403)	c. The temperature chart (or digital) recorder is subject to the parametric monitoring and recordkeeping requirements of Regulation 1-523. (basis: Regulation 1-523) **Notes:** • Refer to Regulation 1-523 which dictates parametric monitoring downtime provisions and recordkeeping.

Section 7 Enforcement

Violation by the applicant of any of the conditions set forth in this permit shall subject the company to appropriate enforcement action under Chapter 4 of Part 4 of Division 26 of the California Health and Safety Code. (basis: Regulation 2-1-403)	Violation by NUMMI of any of the conditions set forth in this permit shall subject NUMMI to appropriate enforcement action under Chapter 4 of Part 4 of Division 26 of the California Health and Safety Code. (basis: Regulation 2-1-403) **Notes:** • Changed words applicant and company to NUMMI.

Section 8 - Miscellaneous

B. For the purpose of these conditions, any reference to "the applicant" shall be deemed to also refer to the applicant's agents, contractors, subcontractors, assignees, or joint venture partners, as well as to any party brought in to operate the proposed facility, as appropriate. (basis: Regulation 2-1-403)	b. For the purpose of these conditions, any reference to "NUMMI" shall be deemed to also refer to the NUMMI's agents, contractors, subcontractors, assignees, or joint venture partners, as well as to any party brought in to operate the proposed facility, as appropriate. (basis: Regulation 2-1-403) **Notes:** • Change the word applicant to NUMMI
C. The APCO or his representatives shall have the right to inspect and audit all records required to be maintained by Section IV above, and any other records in the applicant's possession which may indicate the nature or quantity of emissions from the proposed facility. (basis: Regulation 2-1-403)	c. The APCO or his representatives shall have the right to inspect and audit all records required to be maintained by Section 5 of Condition 207, and any other records in the NUMMI's possession which may indicate the nature or quantity of emissions from the facility. (basis: Regulation 2-1-403) **Notes:** • Change the word applicant to NUMMI • Change reference to Section IV to Section 5 of Condition 207

Section 8 – Miscellaneous cont.

F. Minimal Voltage Requirements: a) The following minimum voltages shall be maintained as measured at the power supply: 70KV - Prime Bells, Topcoat Bells (Solid & Clear) 50KV - Topcoat Bells (Basecoat) 25KV - Topcoat REA b) Once implemented, but no later than commencement of bumper coating operations, the following minimum voltages shall be maintained for manual coating operations in the Topcoat and Prime Booths, as measured at the electrostatic hand held spray gun: 30KV - Prime, Topcoat, Interior (excludes Blackout) c) Handheld electrostatic spray gun application of the topcoat/interior blackout painting operation is not required. Voltage may be below, or be shut off, for the correction of operational problems or equipment failure for a period of up to 3 days. For periods exceeding 3 days the District must be notified within 24 hours of the 3rd day. Within 7 days of the 3rd day a schedule of compliance and corrective action must be submitted to the District. Excess emissions for the entire period must be calculated and applied to the Passenger Line emission total. (basis: Regulation 2-1-403).	Section deleted. This section is not applicable to the sources covered by this condition.

Section 10 – Corrective Plan

If any of the annual, monthly or hourly limits of Section I or Section II (Table I) are exceeded, the applicant shall implement abatement measures to prevent the recurrence of the type of incident which caused the excess. This plan is intended to provide a mechanism for bringing the applicant back into compliance should a temporary exceedance occur. (basis: Regulation 2-1-403)	If any of the annual or monthly material usage limits are exceeded, NUMMI shall implement abatement measures to prevent the recurrence of the type of incident which caused the excess. This plan is intended to provide a mechanism for bringing NUMMI back into compliance should a temporary exceedance occur. (basis: Regulation 2-1-403) **Notes:** • Replace the word applicant with NUMMI. • Remove references to hourly limits. • Remove reference to Table I
A. If an exceedance of monthly limits for coatings and solvent usage from the passenger car line as specified in Table I becomes apparent (see Section IV), the applicant shall notify the District and will include a Corrective Plan with the monthly report. (basis: Regulation 2-1-403)	a) If an exceedance of either usage or emission limits specified in Sections 1 and 2 of Condition 207, from the applicable sources covered by Condition 207 becomes apparent, NUMMI shall notify the District and will include a Corrective Plan with the next monthly report. (basis: Regulation 2-1-403) **Notes:** • Change monthly material usage to "either usage or emission limits" specified in sections 1 and 2 of this condition. • Replace word applicant with NUMMI. • Specify this plan only covers the sources specified in Condition 207. • Remove reference to passenger car line.

Section 10 – Corrective Plan cont.

B. The corrective Plan will include a commitment by the applicant to come into compliance in such a fashion that the amount of the exceedance shall be made up within the three-month period following such exceedance. For these purposes the exceedance will be calculated on a plant-wide basis, and an excess in one parameter can be balanced by an equivalent reduction in another (see Table I). (basis: Regulation 2-1-403)	b) The corrective Plan will include a commitment by NUMMI to come into compliance in such a fashion that the amount of the exceedance shall be made up within the three-month period following such exceedance. For these purposes the exceedance will be calculated on a plant-wide basis, and excess in one parameter can be balanced by an equivalent reduction in another. (basis: Regulation 2-1-403) **Notes:** • Changed the word applicant to NUMMI. • Remove reference to Table I.
D. If a second or subsequent monthly exceedance occurs in any model year to the same monthly limit, except for the month immediately following the exceedance, the annual total limit will be reduced for only the following year by one-half the amount of the second or subsequent exceedance. (basis: Regulation 2-1-403)	d) If a second or subsequent monthly exceedance occurs in any 12 month consecutive period to the same usage or emission limit, except for the month immediately following the exceedance, the annual total limit will be reduced for only the following year by one-half the amount of the second or subsequent exceedance. (basis: Regulation 2-1-403) **Notes:** • Replace model year with 12 month consecutive period • Replace ”same monthly limit” with “same usage or emission limit”.

Section 10 – Corrective Plan cont.

E. If, at the end of a model year, the total emission (usage) exceeds the yearly totals given in Table I, the yearly totals for only the following year will be reduced by an amount of one-half of the exceedances for the year. (basis: Regulation 2-1-403)	e) If, during any 12 month consecutive period, the total emission limit exceeds the annual limit, the annual totals for only the following year will be reduced by an amount of one-half the exceedance for the following 12 month consecutive period.(basis: Regulation 2-1-403) **Notes:** • Change model year to 12 month consecutive period • Delete references to Table I • Delete reference to usage and left it as emission limit

Other changes to the permit conditions are noted in strikethrough (for deletions) and underline (for additions) format in the Section VI of the Title V permit.

APPENDIX C
BAAQMD COMPLIANCE REPORT

APPENDIX D
GLOSSARY

ACT
Federal Clean Air Act

APCO
Air Pollution Control Officer: Head of Bay Area Air Quality Management District

ARB
Air Resources Board

BAAQMD
Bay Area Air Quality Management District

BACT
Best Available Control Technology

Basis
The underlying authority which allows the District to impose requirements.

CAA
The federal Clean Air Act

CAAQS
California Ambient Air Quality Standards

CAPCOA
California Air Pollution Control Officers Association

CEQA
California Environmental Quality Act

CFR
The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO
Carbon Monoxide

Cumulative Increase
The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District
The Bay Area Air Quality Management District

dscf
Dry Standard Cubic Feet

EPA

The federal Environmental Protection Agency.

Excluded
Not subject to any District regulations.

Federally Enforceable, FE
All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP
Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

HAP
Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

Major Facility
A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

MFR
Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

MOP
The District's Manual of Procedures.

NAAQS
National Ambient Air Quality Standards

NESHAPS
National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

NMHC
Non-methane Hydrocarbons (Same as NMOC)

NMOC
Non-methane Organic Compounds (Same as NMHC)

NOx
Oxides of nitrogen.

NSPS
Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

NSR
New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement
A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility
A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

POC
Precursor Organic Compounds

PM
Particulate Matter

PM10
Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD
Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP
State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2
Sulfur dioxide

THC
Total Hydrocarbons (NMHC + Methane)

Title V
Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC
Total Organic Compounds (NMOC + Methane, Same as THC)

TPH

Total Petroleum Hydrocarbons

TRMP
Toxic Risk Management Plan

TSP
Total Suspended Particulate

VOC
Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year