REVIEW MEMORANDUM
REGULATION NO. 30 (TITLE V) Draft OPERATING PERMIT
DaimlerChrysler Corporation NEWARK ASSEMBLY PLANT
550 SOUTH COLLEGE AVENUE
NEWARK, DE 19714-6040

PERMIT NUMBER: AQM-003/00128

MEMORANDUM FORMAT:

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The applicable requirements as they pertain, based upon a technical and regulatory review, to the emission units and insignificant activities identified by the Company are discussed in the remainder of this memorandum. The regulatory review will indicate those

applicable requirements that are "state enforceable only." All other applicable requirements unless otherwise indicated are both state and federally enforceable.

I. Background:

DaimlerChrysler Corporation operates an automotive assembly plant in New Castle County. New Castle County is classified as severe non-attainment area for ozone. This facility has the potential to emit greater than twenty five (25) tons per year of volatile organic compounds (VOCs) and nitrogen oxides (NO_x), both of which are considered pre-cursors to the formation of ozone; greater than 100 tons per year of carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter; and greater than 25 tons per year of hazardous air pollutants (HAPs) aggregated and 10 tons per year of a single HAP. These emission rates classify this facility as a major source and thereby subject to the Regulation No. 30 (Title V) operating permit program.

Correspondence Chronology:

Department received AQM-1001 Series Application dated December 3, 1196	December 9, 1996
Department letter notifying of administrative completeness	February 3, 1997
Department requested additional information.	August 8, 1997
Revised AQM-1001 application	Received October 23, 1997
Department requested additional information	Dated April 16, 1998
Company submitted additional information	Received May 18, 1998
Department requested additional information	Dated August 14, 1998
Company submitted additional information	Received August 28, 1998
Department requested additional information	Dated September 18, 1998
Company submitted additional information	Received September 28, 1998
Department requested additional information	Dated October 8, 1998
Chrysler requested extension for submittal of information	Received October 16, 1998
Department granted extension	Dated October 16, 1998
Company submitted additional information	Received October 23, 1998

Emission Unit and Emission Point Identification:

DaimlerChrysler Corporation currently manufacturers a sport utility vehicle (SUV) but this may change depending upon market demands. The majority of the emissions at the plant result from vehicle coating (VOCs and HAPs) and the powerhouse (NO_x and SO_2 emissions) which is used to provide heat to the manufacturing areas.

The emission units as identified by the Company are listed in Table No. 1. The process description including identification of any control devices are contained in Sections III through VII of this memorandum. The Insignificant Activities are identified in Section VIII of this memorandum along with corresponding applicable requirements.

Table No. 1	
Emission Unit(s)	**Emission Unit Description**
Powerhouse:	
Emission Unit 1	Boiler #1
Emission Unit 2	Boiler #2
Emission Unit 3	Boiler #3
Emission Unit 4	Boiler #4
Emission Unit 5	Boiler #5
Process Related Emission Units	
Emission Unit 6	Dinamec Fluid Cleaning System
Emission Unit 7	Finish Welding
Emission Unit 8	Inspection and Grinding
Emission Unit 9	Maintenance Spray Booth
Emission Unit 10	Phosphate Line
Emission Unit 11	E-Coat Booth
Emission Unit 12	E-Coat Sanding
Emission Unit 13	Sealer Deck
Emission Unit 14	UV Inspection
Emission Unit 15	Powder Anti-Chip
Emission Unit 16	Main Sand Booth
Emission Unit 17	Repair Sand Booth
Emission Unit 18	Topcoat System (2 identical booths)
Emission Unit 19	Inspection & Finesse
Emission Unit 20	Blackout Application
Emission Unit 22	Low-Bake Repair
Emission Unit 23	Touch-up Booth
Emission Unit 24	Paint Sludge Dryer
Emission Unit 25	Paint Mix Building
Emission Unit 26	Brake Fluid/Antifreeze/Motor Oil/Transmission Oil Fill
Emission Unit 27	Gasoline Fill
Emission Unit 28	Lamp Disposer

Table No. 1		
Emission Unit(s)	**Emission Unit Description**	
Emission Unit 29	Hot Water Generator #1	
Emission Unit 30	Hot Water Generator #2	
Emission Unit 31	Mopar Boiler #1	These emission units have not been transferred into the attached Title V Operating Permit for the following reasons: 1) The operation of these emission units was never authorized pursuant to Regulation No. 2. 2) These units have never been in compliance with Regulation No. 12 (a certification per Section 7.1 was never submitted for these units). 3) These units were removed from service. If new/replacement boilers, reconstructed, or the boilers are put back in service then the requirements of Regulation No. 2(or Regulation No. 25), Regulation No. 20, Regulation No. 12, Regulation No. 8, Regulation No. 4, and 40 CFR Part 60 Subpart Dc all need to be addressed. 4) The Company indicated in their May 18, 1998 supplemental information that these boilers were not to be included in the Title V operating permit.
Emission Unit 32	Mopar Boiler #2	
Emission Unit 33	Mopar Boiler #3	
Emission Unit 34-50	Miscellaneous Combustion Units	
Emission Unit 51	Power Steering Tanks	
Emission Unit 52	Motor Oil Tank	
Emission Unit 53	Antifreeze Tank	
Emission Unit 54	Transmission Fluid Tank	
Emission Unit 55	Gasoline Tank #1	
Emission Unit 56	Gasoline Tank #2	
Emission Unit 57	Resin Tank	
Emission Unit CCP1	Clearcoat Purge Bulk Storage	
Emission Unit OWR1	Organic Waste Recovery	
Emission Unit TA/001	Pre-wipe Bulk Tank	
Emission Unit TA/002	Cleaner Bulk Tank	
Emission Unit E	250,000 gallon No. 6 fuel oil storage tanks (Tanks D and E)	
Emission Unit 59	EDP Storage	
Emission Unit 60	Glass Installation	
Emission Unit 61	Miscellaneous Productive Items	
Emission Unit 62	Miscellaneous Non-Productive Items	

Regulation No. 2 Permit Identification

Table No. 2	
Reference Number	**Full Regulation No. 2 Permit Designation**
APC-95/0569	APC-95/0569 Construction/Operation issued September 7, 1995
APC-95/0569	APC-95/0569 Construction/Operation (Amendment 1) issued August 16, 1996

II. Applicable Requirements corresponding to all Emission Units (including Insignificant Activities) at the facility:

Based upon the information submitted in the AQM-1001 Series Application and supplemental information received:

- The applicable standard industrial code (SIC) for this facility is 3711, transportation equipment.
- The facility to date has paid all applicable fees associated with Regulation No. 30.
- The facility is not subject to the requirements of Section 112(r) of the 1990 Clean Air Act and has registered with the State of Delaware, "Regulations for the Management of Extremely Hazardous Substances."
- This facility has air conditioners or refrigeration equipment that uses CFCs, HCFCs, or other ozone depleting substances. This equipment contains a refrigerant charge less than fifty (50) pounds. Facility personnel does maintain, service, repair, or dispose of appliances. 40 CFR Part 82 Subparts B and F are applicable.
- The facility has not requested that any information contained within the Regulation No. 30 application be marked and held confidential.

Table No. 3	
Applicable Requirement	**Proposed Periodic Monitoring - Facility Wide (Condition 3 Table 1) of the attached permit**
Regulation No. 19 - State Enforceable Only	This regulation contains monitoring/testing under Section 1.2 of Regulation No. 19. The Department proposes that the Company be required to maintain records of the monitoring/testing and complaints pertaining to odor received by the facility in accordance with Regulation No. 30 Section 6(a)(3)(i)(B). The facility shall also conducted surveys weekly to establish the presence or absence of odors. Any detection of odors shall require corresponding recordkeeping of such and corrective actions taken. In accordance with Regulation No. 30 Section 6(a)(1)(i), the Department identifying the following difference in form as compared to the applicable requirement upon which the term or condition is based: Regulation No. 19: No person shall cause or allow the emission of an odorous air contaminant such as to cause a condition of air pollution. Air pollution is defined as: The presence in the outdoor atmosphere of one or more air contaminants in sufficient quantities and of such characteristics and duration as to be injurious to human, plant, or animal life or to property or which unreasonably interferes with the enjoyment of life and property within the jurisdiction of the State, excluding all aspects of employer-employee relationships as to health and safety hazards. Proposed Language: The Company shall not cause or allow the emission of an odorous air contaminant in such quantities as to interfere with any persons enjoyment of life or property. The proposed language removes the word “unreasonably.” The Department proposes this language based upon odor complaints received regarding this facility prior to retooling and that the equipment and coatings used at the plant following retooling were designed so as to minimize odors. Any odor detected will be an indication of abnormal operation requiring corrective action. Any odor complaint which is based on off site detection of odor is an appropriate surrogate for proper operation as well as compliance with the emission standard.
Regulation No. 24 Section 8	Compliance with the work practice standards and recordkeeping of the attached draft permit should ensure compliance with the requirements of this applicable requirement.
PAL Annual Limit for VOCs and NO_x	1112.8 tons of VOCs 150.71 tons of NO_x Applicable to all VOC and NO_x emitting sources including insignificant activities at the facility. Compliance with the PAL shall be determined within 30 days of the end of each month based on the prior 12 months.

Table No. 3	
Applicable Requirement	**Proposed Periodic Monitoring - Facility Wide (Condition 3 Table 1) of the attached permit**
PAL Daily Limit for VOCs and NO_x	5.3 tons per day of VOCs 4.86 tons per day of NO_x Applicable to all VOC and NO_x emitting sources including insignificant activities at the facility. Compliance with the daily limit will be based on daily emissions of specific units in this permit. For all other sources daily emissions will be based on monthly emissions prorated to individual days, based on daily vehicle production volumes or another emissions indicator as approved by the DNREC.

The powerhouse boilers have not been stack tested. EPA (AP-42) emission factors of 140 $lb/10^6$ ft^3 for natural gas combustion and 55 $lb/10^3$ gal for No. 6 fuel oil combustion are used in the monthly compliance demonstrations. It is recommended that one or more boilers be stack tested to verify compliance with the emission factors used in the monthly compliance demonstrations.

PAL & Operational Flexibility:

On June 1, 1995 Chrysler Corporation filed an air pollution control permit application with the State of Delaware Department of Natural Resources and Environmental Control (DNREC) for the following projects. As a result of the following projects, Chrysler saw a net decrease in VOC emissions and was able to utilize a number of Pollution Prevention measures:

- Waterborne E-Coat and basecoat
- Powder antichip and clearcoat system designed for subsequent conversion to powder coating once it is developed.
- Reformulated coatings to eliminate or reduce HAP emissions, and
- Paint sludge drying and shipment off site for recycling.

[Chrysler has since decided to send the paint sludge off-site for recycling. The paint sludge dryer and incinerator are not currently in use. However, the operational flexibility to operate the paint sludge dryer if needed is retained from permit APC-95/0569 and transferred to the attached permit. A permit condition has been added requiring documentation of the off-site recycling.]

The intent of the following discussion regarding the LAER decision and PAL development is provided for informational and background purposes.

Chrysler upgraded and modernized controls of the coating system and the coating environment. These measures allowed the Newark Assembly Plant to have flexibility to build a range of products beginning with the manufacturing of a light duty truck. DNREC determined at the time of the construction application, that Regulation No. 25, "Preconstruction Review," (providing for Lowest Achievable Emission Rate (LAER) performance and the offsetting of emission increases) applied to the topcoat booth. LAER and emission offsets (generated from the conversion of a solvent priming system to a powder system) were provided for the topcoat booth. Simultaneous with the review and approval of the construction permit application, DNREC and Chrysler established Plantwide Applicability Limits (PALs) for NO_x and VOCs for the facility. Consistent with EPA policy, the PAL was established on certain principles:

> The PAL limits reflect recent actual emissions, adjusted downward to account for VOC emission offsets and reductions due to rules relied upon in the Delaware SIP. The provisions of Federal PSD and LAER and offsets will not apply to future modifications so long as the cap limits are not exceeded. However, DNREC will continue to review and approve certain types of changes under the state preconstruction review process in Regulation No. 2.

Based upon the review of the four LAER determinations reviewed at the time of the 1995 application and Chrysler's pollution prevention efforts, 8.45 lbs/GACs (gallons applied coating solids) was decided upon as LAER. This is consistent with the LAER determinations at the Chrysler plants in Michigan and Missouri. While a limit 8.45 lb/GACS is higher than the limits in the two Ford Plants, DNREC has determined that a higher limit is justified because Chrysler's approach to coating is fundamentally different than those for the other (Ford) truck assembly operations. Chrysler has incorporated certain pollution prevention elements into its coating operations that decrease total VOC, NO_x, and CO_2 emissions. Specifically, Chrysler does not use primer surfacer (guidecoat) in its coating operations, which results in a significant decrease in overall VOC emissions. Also, only Chrysler uses a powder anti-chip coating. [However, the facility currently uses a small amount of primer, which is subject to Regulation No. 24 Section 13, VOC RACT requirements - this has been included in the attached permit.]

Chrysler's approach to coatings also reduces emission of NO_x and CO_x because add on controls, such as incinerators, which may have been necessary for guidecoat or non powder anti chip coating operations, are not required. The powder coating contains a small amount of VOCs, 0.001 lb VOC/gal. For odor control reasons, Chrysler vents the Powder Anti-Chip oven to the RTO. This RTO also abates VOC emissions from the E-Coat oven and Topcoat heated flash zones and ovens.

The Pollution Prevention Act of 1990 endorses the type of "source reduction" that Chrysler has incorporated into its coating operation. The Pollution Prevention Act considers source reduction a fundamental aspect of pollution prevention and encourages practices that reduce the amount of hazardous substances entering a waste stream. By using powder anti-chip, incineration is not needed on booth operations. Chrysler's coating operations eliminate VOC, NO_x, and CO_2 emission sources and generate less emissions per unit output than either of the two Ford truck assembly plants. Given the pollution prevention measures Chrysler has incorporated into its coating operations, DNREC determined that a limit of 8.45 lb/GACS for the topcoat operations fulfills LAER requirements.

Additionally, Chrysler is supporting the development of and is intending to use powder clearcoat in this facility once it is commercially available and is designing the new topcoat operation so that powder clearcoat can be retrofitted. The prospects for powder clearcoat are important to Chrysler's control technology selection for the new equipment. Clearcoat is the only remaining coating step which is not waterborne or powder based. Some manufacturer's incinerate a portion of clearcoat booth emissions. If Chrysler were to install add on controls now, retrofitting powder clearcoat would not be economical and the added emissions and energy use of incineration would continue for the useful life of this new equipment. Instead, through pollution prevention efforts over the last decade, Chrysler can achieve LAER now without add on booth controls and position this facility to take full advantage of powder clear coat when it is commercially available.

A permit condition was incorporated into the Regulation No. 2 operating permit (and transferred into the attached Title V draft operating permit) requiring Chrysler to implement Powder Clear Coat by September 1, 2003 if commercially available or employ pollution prevention measures sufficient to reduce topcoat VOC emissions to less than 7 pounds volatile organic compounds per gallon of applied coating solids on a daily weighted basis until powder clearcoat is commercially available, at which time the Company shall install as expeditiously as practical powder clearcoat. If the Company believes that it will not be able to meet this requirement, then the Company will be required to achieve 6 pounds VOCs per GACS on a daily weighted average basis as expeditiously as possible. That plan will become an enforceable requirement of the permit upon DNREC approval of that plan.

The annual plantwide limits will be met monthly on a rolling cumulative basis. The two PAL limits (one for VOC and one for NO_x) will be retained unit November 22, 2002 after which those limit could be adjusted downward to reflect the effect of any new state NO_x and VOC regulations applicable to sources at the plant. The downward adjustment will be based on the contribution of the affected sources to actual emissions at the time the rule goes into effect.

As a secondary feature of the PAL, daily limits for VOC and NO_x were established based on recent actual experience with emissions variability. Compliance with those limits will be determined monthly, with the allocation of emissions to individual days based on production data or other indicators approved by DNREC.

The PAL provisions do not exempt the source from any future applicable NSPS and MACT requirements. The PAL permit does not relieve the Company of complying with applicable provisions of the State of Delaware's Regulation No. 30, "State Operating Permit Program," once the Regulation No. 30 operating permit is issued. The permit conditions established in the Regulation No. 2 operating permit have been transferred into the attached permit.

PAL Provisions:

The following PAL provisions were developed in 1995 and were based upon the requirements of Regulation No. 2 and other applicable regulations. With an promulgation date of June 1, 1996, Regulation No. 2 was modified to address Federal Enforceability, permit streamlining, public comment periods, and Regulation No. 30. As a result the following provisions have been modified to reflect Regulation No. 2 (promulgation date of June 6, 1996). The strike-out portions represent those portions to be deleted and the underlined portions represent the new requirements based upon Regulation No. 2.

1. The Company shall not construct new stationary sources, modify existing stationary sources, or operate existing stationary sources such that the plantwide annual and daily VOC and NO_x are exceeded. The Company shall comply with Regulation No. 25, "Preconstruction Review", for any proposed construction or modification increasing the plantwide VOC or NO_x annual emission limits. *[Reference Permit APC-95/0569]*

2. The Company is approved to make the changes listed under (i) and (ii) of this condition. The Company shall comply with all certification, recordkeeping, and reporting requirements listed in this permit for the following pre-approved changes. Any change that is subject to a new applicable requirement as defined in Regulation 30 and not listed in this permit shall comply with Condition 2(d)(4) or Condition 2(d)(5) of this permit. *[Reference Permit APC-95/0569]*

   i. Conventional pre-approved changes:
      A. The emission unit is replaced in kind or replaced with a unit with inherently lower emissions.
      B. operational changes which will not increase the short term emission imit established in Condition 3 Table 1(y)(1)(i)(B).
      ~~C. any of the exemptions listed under Regulation No.2, Section 3, "Exemptions", except 3.1(b)(1) dated March 8, 1995.~~
      C. any of the exemptions listed under Regulation No. 2, Appendix "A" dated 6/1/97.

   ii. PAL Pre-approved changes (for VOC and NO_x sources only):
      A. in-kind replacement of an emissions unit or replacement with an inherently lower emitting unit.
      B. introduction of new types of VOC containing materials used for new models.
      C. changes in the number and type of applicator equipment.
      D. changes in the physical dimensions of each oven or booth to accommodate production needs.
      E. addition or elimination of auxiliary cleaning steps or minor coating operations which affect VOC emissions.

      [Reference Permit APC-95/0569]

3. The Company shall maintain adequate records of the changes made at the facility under Condition 4(d) so as to ensure proper recordkeeping and reporting of emissions. Calculations based on material balances, emissions factors and test data used to ensure and demonstrate that the emissions limits in Conditions 3 Table 1(y)(1)(i) are not exceeded shall reflect such changes and shall be maintained for a period of five (5) years. Changes under Condition 4(d) shall be those pre-approved changes recorded and reported pursuant to the recordkeeping and reporting requirements listed in Condition 3 Table 1. *[Reference Permit APC-95/0569]*

4. Except for the pre-approved changes described in Condition 4(d)(2) of this permit, Regulation 2, Minor New Source Review, shall continue to apply to emission units that are proposed modifications with increases in associated VOC or NO_x emissions or to proposed new emission units to be constructed with less than 25 tons per year potential to emit for VOC or NO_x.

   A complete application - meeting all of the requirements of Regulation No. 2 Section 11.2 paragraphs a through j - shall be submitted with sufficient information for public notice. The Company shall specifically follow the requirements of Regulation No. 2 Section 11.2(j) and Section 11.5 in order for the terms and conditions of the construction permit to be transferred into the Regulation No. 30 permit via the administrative permit amendment process specified in Regulation No. 30. The Department will follow the requirements under Regulation No. 2 Sections 12.3, 12.4, 12.5, and 12.6 as appropriate in order to comply with the administrative permit amendment procedures of Regulation No. 30. ~~Forty-five (45) days following the public notice, unless the Department objects or issues supplemental conditions, the project will be automatically approved. Should a public hearing be requested, the automatic approval process will cease.~~ *[Reference Regulation No. 2 Sections 2, 11, and 12 dated 6/1/97 and Permit APC-95/0569]*

5. Except for the pre-approved changes in Condition 4(d)(2) of this permit, modification to an existing emission unit with a potential to increase emissions by 25 tons per year or greater of VOCs or NO_x or new construction of an emission unit with a potential to emit greater than 25 tons per year VOC or NO_x shall be subject to Regulation No. 2. No additional emission rate requirements will be added to the PAL permit so long as toxics concerns are adequately addressed, PAL limits are not exceeded, and best available control technology is incorporated in the installation. Best available control technology decisions will have an emphasis on pollution prevention rather than the more traditional end-of-pipe analysis. The Company shall submit a permit amendment request in accordance with Regulation No. 2 for an increase in the short term emission limit as stated in Condition No. 3 Table 1(y)(1)(i)(B) of this permit. A complete application - meeting all of the requirements of Regulation No. 2 Section 11.2 paragraphs a through j - shall be submitted with sufficient information for public notice. The Company shall specifically follow the requirements of Regulation No. 2 Section 11.2(j) and Section 11.5 in order for the terms and conditions of the construction permit to be transferred into the Regulation No. 30 permit via the administrative permit amendment process specified in Regulation No. 30. The Department will follow the requirements under Regulation No. 2 Sections 12.3, 12.4, 12.5, and 12.6 as appropriate in order to comply with the administrative permit amendment procedures of Regulation No. 30. *[Reference Permit APC-95/0569]*

6. MACT Determinations: The Company shall comply with Section 112(g) requirements as specified in the State of Delaware, **"Regulations Governing the Control of Air Pollution**," Regulation No. 38, "**Emission Standards for Hazardous Air Pollutants for Source Categories**." Preconstruction review requirements that may be triggered under this provision can not qualify as a pre-approved change. *[Reference APC-95/0569]*

Under the facilitywide section of the attached permit - Condition 3 Table 1(y) - generic conditions are listed for sources subject to Miscellaneous Metal Coating. This was a feature of the PAL permit under Permit APC-95/0569. The source still is required to comply with the construction, reconstruction, and modification requirements under Regulation No. 2 (items 4 and 5 above), the attached permit merely contains the standards, which should alleviate the need to re-open the permit. However, this will have to be evaluated each time a permit application is submitted pursuant to Regulation No. 2 and items 4 and 5 above. Items 4 and 5 do contain procedures to administratively amend a Regulation No. 2 permit requirements into a Regulation No. 30 permit. Chrysler anticipates construction of one additional topcoat booth. The requirement pertaining to this is likewise found under the facilitywide section of the permit - Condition 3 Table 1(y).

Regulation No. 25 Section 3:

The facility did not trigger the requirements of Regulation No. 25 Section 3 (PSD) for SO_2, CO, particulate matter, or PM_{10}. The combined rated heat input capacity of Chrysler's boilers is 360 mmbtu/hr. Therefore, a major source under Regulation No. 25 Section 3 is defined as a source with the potential to emit of 100 tons per year of a regulated pollutant. The facility has a PTE of greater than 100 tons of SO_2, CO, and particulate when aggregating emissions from the powerhouse and the paintshop. By switching from a solventborne primer system to a powder anti-chip system, the facility not only reduced VOC emissions but also particulate emissions generated by paint overspray. The powder overspray is captured and re-used. Particulate emissions decreased when comparing the solventborne system to the powder anti-chip system. A net significant increase of particulate (25 tons) and of PM_{10} (15 tons) did not result when the plant re-tooled.

Actual emissions prior to the re-tooling of CO were 18 tons. Following re-tooling the potential CO emission rate was 68.4 tons. SO_2 emissions decreased as a result of the NO_x RACT plan which utilizes fuel switching for compliance.

Section 112b of the Clean Air Act - Hazardous Air Pollutants:

Specific emission limits regarding Hazardous Air Pollutants (HAPs) as defined under Section 112b of the Clean Air Act were not set in the Regulation No. 2 permit as a result of review for the plant re-tooling and construction of the new paintshop. The State of Delaware does not have a regulation regarding air toxics and the 'case by case' Maximum Achievable Control Technology (MACT) required under Section 112g of the Clean Air Act was adopted by the State of Delaware until June of 1998 (which is identified as Regulation No. 38 of the State of Delaware, "Regulations Governing the Control of Air Pollution." As discussed under Section IX of this memorandum, future applicable requirements under 40 CFR Part 63, National Emission Standards may be applicable in addition to Regulation No. 38.

III. Emission Units Nos. 1 through 5: Powerhouse

Process Description: Boilers Nos. 1 through 5 were all installed in 1951 and each have a rated heat input capacity of 72 mmbtu/hr. All boilers are capable of firing either No. 6 fuel oil or natural gas.

Applicable Requirements:

Regulation No. 2:	Regulation No. 2 Operating Permit, APC-95/0569
Regulation No. 4:	Particulate Emissions from Fuel Burning Equipment
Regulation No. 8:	Sulfur Dioxide Emissions from Fuel Burning Equipment
Regulation No. 12:	Control of Nitrogen Oxide Emissions
Regulation No. 14:	Visible Emissions
Regulation No. 19:	Discussed under Section II of memorandum.

Regulation No. 4:

Section 1.2: *The provisions of this regulation shall not apply where the heat input to the equipment is less than 1,000,000 BTU per hour.*

The rated heat input of the emission units are greater than 1,000,000 BTU per hour. Therefore, the provisions of Regulation No. 4 are applicable requirements.

Section 1.3: *The provisions of this Regulation shall not apply to equipment or operations whose emissions are controlled by Regulation No. 5 or Regulation No. 7 or Regulation No. 29.*

The particulate emissions formed during the combustion of natural gas are not subject to the provisions of Regulation No. 5, Regulation No. 7, or Regulation No. 29. [Regulation No. 5 pertains to particulate emissions from industrial process operations, Regulation No. 7 pertains to particulate emissions from incineration of noninfectious waste, and Regulation No. 29 pertains to incineration of infectious waste.]

Section 1.4: *For the purposes of this regulation, the heat input shall be based upon the manufacturer's guaranteed maximum input or the Department's calculated input.*

The heat input is based upon the manufacturer's guaranteed maximum input.

Section 1.5: *The provisions of this Regulation shall not apply to the start-up and shutdown of equipment which operates continuously or in an extended steady state when emissions from such equipment during start-up and shutdown are governed by an operation permit issued pursuant to the provisions of Section 2, Regulation No. 2.*

Regulation No. 2 permits issued to this facility do not contain separate provisions for emissions from start-up and shutdown. Therefore, the provisions of this regulation apply during all periods of operation, including start-up and shutdown.

Section 2.1: *No person shall cause or allow the emission of particulate matter in excess of 0.3 lb/mmbtu input, maximum 2 hour average, from any fuel burning equipment.*

Compliance Determination Methodology for Regulation No. 4:

Using the following equations based on emission factors from the Environmental Protection Agency's (EPA) Compilation of Air Pollutant Emission Factors, Volume I, Fifth Edition, AP-42, the boilers do not exceed the emission limit of 0.3 lb/mmbtu when burning No. 6 fuel oil or natural gas.

Equation No. 1: The following equation will be used to demonstrate compliance with the particulate emission standard of 0.3 lb/mmbtu.

$$\frac{\text{AP-42 Emission Factor} * \text{conversion factor } (10^6 \text{ btu/mmbtu})}{\text{heat content of fuel}} = \text{particulate emissions (lb/mmbtu)}$$

No. 6 Fuel Oil Combustion:

AP-42 Emission Factor = {9.19S +3} lb/10^3 gal, from AP-42 Fifth Edition, Table No. 1.3-1 for particulate emissions from No. 6 fuel oil combustion, where S=% sulfur (which is for worst case purposes a value of one (1) percent because this is the regulatory limit for a residual fuel oil.)

Heat Content of No. 6 fuel oil = 150,000 btu/gallon

Equation No. 2:

$$\frac{12.19\frac{lb}{gal}*10^6\frac{btu}{mmbtu}}{150{,}000\frac{btu}{gal}}=0.081\frac{lb}{mmbtu}$$

Natural Gas Combustion:

AP-42 Emission Factor = 13.7 lb/10^6 ft^3 , from AP-42, Fifth Edition, Table No. 1.4-2 for particulate emissions from natural gas combustion, small industrial boilers, uncontrolled.

Heat content of natural gas = 1050 btu/ft^3

Equation No. 3:

$$13.7\frac{lb}{10^6 ft^3}*\frac{ft^3}{1050btu}*\frac{10^6 btu}{mmbtu}=0.013\frac{lb}{mmbtu}$$

This one time determination is sufficient for compliance with this regulation for the combustion of No. 6 fuel oil and natural gas only.

This regulation does not contain monitoring or recordkeeping requirements. In accordance with Regulation No. 30, Section (6)(a)(3)(i)(B), the Department proposes the following as acceptable periodic monitoring:

Monitoring: The Company shall continuously monitor the type of fuel burned in the boilers.

Recordkeeping: Records documenting the type and amount of fuel burned in the powerhouse boiler each month is sufficient for compliance with this regulation in addition to complying with the general recordkeeping requirements of Condition 3(b)(2) of the attached permit.

Reporting: No additional reporting to that required by Condition 3(c)(2) of the attached permit.

Operational Limitation: In accordance with Regulation No. 30, Section 6(a) and Permit APC-95/0569, it is proposed that the facility only be allowed to burn No. 6 Fuel oil and/or natural gas in the powerhouse (in accordance with compliance with Regulation No. 12 - fuel switching.)

Regulation No. 8, Sulfur Dioxide Emissions from Fuel Burning Equipment	
Section 1.2: *The provisions of this regulation shall not apply to the start-up and shutdown of equipment which operates continuously or in an extended steady state when emissions from such equipment during startup and shutdown are governed by an operation permit issued pursuant to the provisions of Section 2, Regulation No.2*	Regulation No. 2 permits issued to this facility do not contain separate provisions for emissions from start-up and shutdown. Therefore, the provisions of this regulation apply during all periods of operation, including start-up and shutdown.
Sections 1.3 and 1.4	Not applicable.
Section 2.1: *Except as provided in Section 2.2, no person shall offer for sale, sell, deliver, or purchase any fuel having a sulfur content greater than one (1.0) percent by weight when such fuel is intended for use in any fuel burning equipment in New Castle County. No person shall use any fuel having a sulfur content greater than one (1.0) percent by weight in any fuel burning equipment in New Castle County.*	Compliance Determination Methodology: This regulation does not contain monitoring requirements or recordkeeping requirements. In accordance with Regulation No. 30, Section 6(a)(3)(i)(B), the Department proposes the following as acceptable periodic monitoring: Monitoring/Testing: The method used to determine the sulfur content must be one of the following ASTM methods: D129-91, D1552-90, D2622-92, D4294-90. Recordkeeping: The Company shall maintain all of the following records: Fuel supplier certification for each No. 6 fuel oil shipment received at the facility. Such certification shall include: • Name of fuel supplier • Date delivered • Amount delivered • Oil sampling method • The sulfur content of the distillate fuel oil • The method used to determine the sulfur content Alternatively, the facility can elect to perform the % sulfur analysis for each shipment received. There are not additional reporting/certification requirements to those listed in Conditions 3(c)(2) and 3(c)(3) of the attached permit.
Section 2.2: *No person shall offer for sale, sell, deliver or purchase, or use in any fuel burning equipment, distillate fuel oil having a sulfur content greater than 0.3 percent by weight.*	Distillate fuel oil is not burned in Boilers 1 through 5. The provisions of this section are not applicable.
Section 2.3: *Oil Sampling Method - oil samples shall be obtained using proper American Society for Testing and Materials (ASTM) methods or alternative methods approved by the Department.*	Included in Compliance Determination Methodology discussed above.

Regulation No. 8, Sulfur Dioxide Emissions from Fuel Burning Equipment	
Section 2.4: *Sulfur concentration of residual and distillate fuels shall be determined by the x-ray absorption and/or the parr oxygen bomb technique.*	The Department recently issued a policy memorandum entitled Division of Air and Waste Management (DAWM) Policy for Alternate Testing Methods dated September 17, 1997 signed by Nicholas A. DiPasquale, Director, allowing the use of the following ASTM methods to determine the sulfur content of the fuel oil: D129-91, D1552-90, D2622-92, D4294-90.

Regulation No. 12: Control of Nitrogen Oxide Emissions	
Section 3.6	Fuel Switching - burn natural gas (90% availability) from April 1 through October 31 of each year. Compliance Determination Methodology: Monitor type of fuel combusted for each boiler. Records of fuel usage records for the powerhouse.
Section 7.1	Previously submitted - compliance through Section 3.6
Section 7.2	Recordkeeping for five (5) years - transferred
Section 7.3	Reporting - transferred
Section 7.4(a)	A continuous emission monitor (CEM) is not required. This section is not included in the attached draft permit.
Section 7.4(b)	Test methods transferred into the permit. Compliance with Regulation No. 12 is fuel switching. Testing is not required for compliance with fuel switching. Frequency of testing and test methods per Regulation No. 17 Section 2.1 - Condition 3(b)(1)(ii).

Regulation No. 14: Visible Emissions	
Section 2.1: *No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20) percent for an aggregate of more than three (3) minutes in any one (1) hour, or more than fifteen (15) minutes in any twenty-four (24) hour period.*	Compliance Method: The Department proposes in accordance with Regulation No. 30 Section 6(a)(3)(i)(B) the following periodic monitoring: The Company shall conduct monthly observations per Reference Method 9 for each boiler in operation. If the unit is not operated for an entire calendar month, records documenting this shall be maintained. This approach is based upon the periodic monitoring proposed by Chrysler on Exhibit 1001X revised May 1998 and signed by the responsible official.
Section 4.1: *For purposes of this regulation, compliance with the opacity standard shall be in accordance with Subsection 1.5(c) of Regulation No. 20.*	The requirements of this section have been transferred into the attached draft operating permit.

IV. Emission Units Nos. 6 through 28 and 60: Process Related Emission Units

The regulatory, technical, and compliance review for Emission Units Nos. 6 through 28 and 60 are discussed in this section of the memorandum. Due to the number of sources, sources are grouped in together to discuss the same applicable requirement. Table No. 4 provides a general overview of applicable requirements.
Emission Unit No. 14 is discussed under Section VII of this memorandum.

Table No. 4

Emission Unit Identification	Emission Unit Description	Applicable Requirements
6	Dinamec	2, 5, 14, 19
7	Finish Welding	2, 5, 14, 19
8	Inspection and Grinding	2, 5, 14, 19
9	Maintenance Paint Spray Booth	2, 5, 14, 19, 24
10	Phosphate Line	Company certified that this source does not emit any VOCs or HAPs. The source was included in the initial PAL permitting as a construction project and is therefore included under the facility-wide PAL requirements. It does not have specific applicable requirements.
11	E-Coat Booth	2, 4, 12, 14, 19, 20, 24, 40 CFR Part 60 Subpart MM
12	E-Coat Sanding	2, 5, 14, 19
13	Sealer Deck	2, 14, 19, 24
15	Powder Anti-Chip	2, 5, 12, 14, 19, 24
16	Main Sand Booth	2, 5, 14, 19
17	Repair Sand Booth	2, 5, 14, 19
18	Topcoat System (2 identical booths)	2, 5, 14, 19, 20, 24, 40 CFR Part 60 Subpart MM
19	Inspection & Finesse	2, 5, 14, 19
20	Blackout Application	2, 5, 12, 14, 19, 24
22	Low-Bake Repair	2, 5, 12, 14, 19, 24
23	Touch Up Booth	2, 5, 12, 14, 19, 24
24	Paint Sludge Dryer	2, 4, 12, 14, 19, 24
25	Paint Mix Building	2, 14, 19, 24
26	Brake Fluid/Antifreeze/Motor Oil/Transmission Oil Fill	2, 14, 19, 24

Table No. 4		
Emission Unit Identification	**Emission Unit Description**	**Applicable Requirements**
27	Gasoline Fill	2, 14, 19, 24
28	Lamp Disposer	2, 5, 14, 19
60	Glass Installation	2, 14, 19, 24

The requirements of Regulation No. 19 and Regulation No. 24 Section 8 are discussed under Section II of this memorandum.

Regulation No. 4 Section 1.3 states that the provisions of Regulation No. 4 do not apply when the emissions are controlled by Regulation No. 5, Regulation No. 7, or Regulation No. 29. Regulation No. 5 is the controlling particulate regulation for the emission units identified in Table No. 4, except for Emission Unit No. 24, Paint Sludge Dryer, which is subject to only the requirements of Regulation No. 4.

<table>
<tr><td colspan="2">Regulation No. 4
Emission Unit No. 24 - Paint Sludge Dryer
The dryer is controlled by a natural gas fired incinerator. This emission unit contains two burners (one rated at 2.0 mmbtu/hr and the other at 2.7 mmbtu/hr) for a total rated heat input capacity of 4.7 mmbtu/hr.</td></tr>
<tr><td>Section 2.1:
No person shall cause or allow the emission of particulate matter in excess of 0.3 lb/mmbtu input, maximum 2 hour average, from any fuel burning equipment.</td><td>AP-42 Emission Factor: 11.9 lb/10^6 ft^3, Fifth Edition, Table No. 1.4-2 for particulate emissions from natural gas combustion for commercial boilers (0.3-<10mmbtu/hr).
Heat Content of natural gas: 1050 btu/ft^3

Equation:
AP-42 Emission Factor*Conversion Factor (10^6 btu/mmbtu) = Particulate in lb/mmbtu
Heat Content of Natural Gas

Compliance Demonstration:
$$\frac{11.9\,lb \times \frac{10^6}{mmbtu}}{\frac{10^6\,ft^3}{1050\,btu}} = 0.011\,\frac{lb}{mmbtu}$$</td></tr>
<tr><td>Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B)</td><td>This one time determination is sufficient for compliance with this regulation for the combustion of natural gas fuel only.

This regulation does not contain monitoring or recordkeeping requirements. In accordance with Regulation No. 30, Section 6(a)(3)(i)(B), the Department proposes the following as acceptable periodic monitoring:

Monitoring: The Company shall continuously monitor the fuel burner in this emission unit.
Recordkeeping: Records documenting the amount of fuel burned in this emission unit each month.
Reporting: No additional reporting to that required by Condition 3(c)(2) of the attached permit.
Operational Limitation: In accordance with Regulation No. 30 Section 6(a), this emission unit shall only combust natural gas.</td></tr>
</table>

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 6	Dinamec Fluid Cleaning System: Paint is removed from metal tools and equipment using sand. The Company indicated that no VOCs and/or solvents are used in this process. Two cyclones are used to control particulate emissions. The process uses a natural gas fired burner, which was identified as an insignificant activity (discussed under Section VIII of this memorandum). This unit was installed in 1997. Based upon a 99% removal and 100% capture efficiency cited by the Company, the potential to emit from this unit is : $0.073\frac{gr}{scf} * 5980\frac{cf}{\min} * \frac{1lb}{7000gr} * 60\frac{\min}{hr} * 8760\frac{hr}{yr} * \frac{1ton}{2000lbs} = 16.4\frac{tons}{yr}$ If the cyclones were not in place, the potential to emit from this unit would be: $7.3\frac{gr}{scf} * 5980\frac{cf}{\min} * \frac{1lb}{7000gr} * 60\frac{\min}{hr} * 8760\frac{hr}{yr} * \frac{1ton}{2000lbs} = 1634\frac{tons}{yr}$ Chrysler indicated that this unit is not operated continuously - expected emissions are 2.1 tons.	Regulation No. 4: Not applicable per Section 1.3 - particulate emissions are covered under Regulation No. 5 Section 2.1 Regulation No. 5: Emission Standard: 0.2 gr/scf Emission Rate: 0.073 gr/scf based upon 99% control and 100% capture. This is highly unlikely for a cyclone where typical removal efficiencies are 80%. Operational Limitation: 1) The Company shall operate and maintain the process equipment and corresponding capture and control equipment in accordance with the manufacturer's specifications. Periodic Monitoring per AQM-1001X: The Company indicated that they operate the system per the manufacturer's specifications. In addition, the Department proposes recording routine and non-routine maintenance of the control equipment and associated capture system.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 7	Finish Welding: Particulate emissions are generated from the welding, two grinding stations, and blasting stations. No control device is used. The Company estimated that particulate emissions from this operation is 0.096 lb/hr/station.	Regulation No. 5: Emission Standard: 0.2 gr/scf Section 7.1: Hazardous Particulate Matter: manganese (Section 112b) Periodic Monitoring per AQM-1001X: Company proposed: raw materials used in unit updated annually. Use of company specific emission factor (***0.096*** lb/hr/station) multiplied by hours of operation. The Department proposes: The company specific emission factor has never been validated by the Department. Particulate emissions are not removed by filters or a baghouse. Department proposed periodic monitoring in accordance with Regulation No. 30 Section 6(a)(3)(i)(B): In addition to adherence to the manufacturer's operation and maintenance procedures, the Company shall once a month: 1) record routine and non-routine maintenance 2) maintain a copy of the manufacturer's operation and maintenance procedures.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 8	Inspection and Grinding: grinding and inspection of automobile bodies in preparation for painting. Operation separated into heavy grinding followed by inspection and then finesse grinding. Each station has its own plant exhaust. Particulate matter is generated and emitted by this process. No control device is used.	Regulation No. 5: Emission Standard: 0.2 gr/scf Operational Limitation: 1) the filter media shall be operated and maintained in accordance with the manufacturer's specifications. Periodic Monitoring per AQM-1001X: Company proposed: Hours of operation updated annually. Use company emission factor (not substantiated by the Department) of 0.096 lb/hr multiplied by hours of operation adjusted to unit flow rate to demonstrate compliance. Department proposed periodic monitoring in accordance with Regulation No. 30 Section 6(a)(3)(i)(B): In addition to adherence to the manufacturer's operation and maintenance procedures, the Company shall once a month: 1) record routine and non-routine maintenance 2) maintain a copy of the manufacturer's operation and maintenance procedures.
Emission Unit 9	Maintenance Paint Spray Booth: carts, signs, tables, and miscellaneous items are coated in this booth. The paint overspray generated is controlled by a dry filter system and water wash system. The VOC emissions and compliance are discussed further in this memorandum. This emission unit was installed in 1989. The Company indicated that the particulate emission rate is about 0.03 lb/hr and 0.09 ton per year after control. Most of the powder is captured and recycled. A small fraction is emitted	Regulation No. 5: Emission Standard: 0.2 gr/scf Control device efficiency 99% and 100% capture. Operational Limitation: 1) the booth shall not be operated without filters and waterwash system. 2) the filter media shall be operated and maintained in accordance with the manufacturer's specifications. 3) The Company shall maintain the water wash system in accordance with the manufacturer's recommended operating and maintenance

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
	from the booth (overspray) and from the oven (combustion of natural gas).	procedures. Periodic Monitoring per AQM-1001X: Company proposed: maintain filters in accordance with the manufacturer's specifications. The Department agrees with what the Company proposed. In addition (and in accordance with Regulation No. 30 Section 6(a)(3)(i)(B)), the Department proposes the following: 1) record routine and non-routine maintenance 2) maintain a copy of the manufacturer's operation and maintenance procedures. 3) The Company shall once a month check integrity of the water wash system and record results.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 12	E-Coat Sanding: vehicles are sanded in preparation for application of sealers. Control device used: dry filtration system used to control particulate emissions. 95% control and 100% capture efficiencies. This emission unit was installed in 1997. Company specific emission factor: 0.096 lb/hr/station. Not substantiated or validated by the Department.	Regulation No. 5: Emission Standard: 0.2 gr/scf Operational Limitation: The Company shall maintain the filter media in accordance with the manufacturer's recommended operation and maintenance procedures. Periodic Monitoring per AQM-1001X: Company proposed: one time demonstration of compliance based upon company specific emission factor - emission limit can not be exceeded - as stated by the Company. System will be operated in accordance with manufacturer's specifications. The Department proposes: The Department agrees that the unit should be operated in accordance with the manufacturer's specifications. In addition the Company shall log all routine and non routine maintenance. However, the Company specific emission factor has never been substantiated by the Department.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 15	Powder Anti-Chip: powder anti-chip is applied to vehicles. Particulate generated from overspray is collected and recycled. Estimated emissions: 0.11 lb/hr and 0.36 tpy of particulate. Less than 0.001 gr/scf	Regulation No. 5: Emission Standard: 0.2 gr/scf Operational Limitation: 1) The Company shall maintain the filter media in accordance with the manufacturer's recommended operating and maintenance procedures. 2) The Powder Anti-Chip booth shall not be operated without HEPA filters. Periodic Monitoring per AQM-1001X: Company proposed: process unit will not be operated without HEPA filters. In addition, the Department proposes (in accordance with Regulation No. 30 Section 6(a)(3)(i)(B)), the following: 1) The Company shall log routine and non-routine maintenance performed on the filter media.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 16	Main Sand Booth: vehicles are sanded in preparation for application of topcoat. Control device: dry filtration system. 95% control and 100% capture efficiencies.	Regulation No. 5: Emission Standard: 0.2 gr/scf Operational Limitation 1) The Company shall maintain the filter media in accordance with the manufacturer's recommended operating and maintenance procedures. Proposed Periodic Monitoring per AQM-1001X: Company proposed: system will be operated according to manufacturer's specifications - Use of company specific emission factor. Annual demonstration - 0.096 lb/hr/station Department Proposed Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): In addition to the Company's proposed monitoring, the Company shall log routine and non-routine maintenance performed on the filter media.
Emission Unit 17	Repair Sand Booth: vehicles are sanded in preparation of topcoat. Control device: dry filtration system. 95% control and 100% capture efficiencies stated.	Regulation No. 5: Emission Standard: 0.2 gr/scf Operational Limitation 1) The Company shall maintain the filter media in accordance with the manufacturer's recommended operating and maintenance procedures. Proposed Periodic Monitoring per AQM-1001X: Company proposed: system will be operated according to manufacturer's specifications - Use of company specific emission factor. Annual demonstration. Department Proposed Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): In addition to the Company's proposed monitoring, the Company shall log routine and non-routine maintenance performed on the filter media.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 18	Topcoat System: particulate emissions generated from combustion of natural gas in the curing ovens and from the paint overspray in the basecoat and clearcoat booths. Paint overspray is controlled by a water wash system.	Regulation No. 2: Permit APC-95/0569 Emission Limitation: 0.02 gr/scf Regulation No. 5: Emission Standard: 0.2 gr/scf Proposed Periodic Monitoring per AQM-1001X: Department Proposed Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): Monitoring/Recordkeeping: 1. The Company shall maintain a copy of the manufacturer's specifications for operation and maintenance for the down draft scrubber system. 2. A log of routine and non routine maintenance log for the downdraft scrubber system. 3. The Company shall weekly check the integrity of the water wash system and record results. Operational Limitation per Permit APC-95/0569 and Regulation No. 30 Section 6(a)(1): The booths in emission unit 18 shall not be operated unless the corresponding down draft scrubber system is operating properly.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 20	Blackout Application: Particulate emissions are generated from paint overspray in this emission unit. Particulate emissions are controlled by dry filters. Date Installed: 1997	Regulation No. 5: Emission Standard: 0.2 gr/scf Proposed Periodic Monitoring per AQM-1001X: Company proposed: operation and maintenance in accordance with the manufacturer's specifications. Department Proposed Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): 1. The Company shall maintain a copy of the manufacturer's specifications for operation and maintenance of the process equipment and filter media. 2. The Company shall log routine and non-routine maintenance performed on the filter media.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Units 22 & 23	Low Bake Repair & Touch Up Repair: Particulate emissions are generated from paint overspray in this final repair operation and the touch up repair operation. Particulate emissions are controlled by dry filters. Date Installed: 1997	Regulation No. 5: Emission Standard: 0.2 gr/scf Proposed Periodic Monitoring per AQM-1001X: The Company proposes operating and maintaining the emission unit and control device (dry filters) in accordance with the manufacturer's specifications. Department Proposed Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): 1. The Company shall maintain a copy of the manufacturer's specifications for operation and maintenance of the process equipment and filter media. 2. The Company shall log routine and non-routine maintenance performed on the associated filter media. Operational Limitation per Regulation No. 30 Section 6(a)(1) and Permit APC-95/0569: The Company shall maintain the filter media in accordance with the manufacturer's recommended operating and maintenance procedures.

Regulation No. 5, Control of Particulate Emissions		
Emission Unit Identification	Process Description	Applicable Regulation/Compliance Method
Emission Unit 28	Lamp Disposers: Chrysler operates a fluorescent lamp disposer to crush fluorescent lamps at the facility. The unit is control by a carbon vapor filtration system. Crushed tubes are dispensed into a 55 gallon drum. The Company claims a 99% removal efficiency of mercury and particulate matter based upon vendor information. The emission unit was installed in 1996 as a result of the re-tooling.	Regulation No. 5: Emission Standard: 0.2 gr/scf, Section 2.1 Proposed Periodic Monitoring per AQM-1001X: Chrysler proposed annually recording the quantity of lamps crushed and multiplying by a company specific emission factor adjusted to unit flow rate to calculate compliance with Regulation No. 5. Department Proposed Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): Monitoring/Recordkeeping: 1. The Company shall maintain a record of the number and type of bulbs crushed on a daily basis for a period of five (5) years. [Reference Permit APC-95/0569] - The permit requires a daily recordkeeping of bulbs crushed. The frequency identified in the application for determining quantity was annual and will not be accepted. It is important that this unit maintain a removal efficiency of 99%. The Department proposes that this be accomplished through proper operation and maintenance of the emission unit including the control device. (additional monitoring/recordkeeping:) 2. The Company shall maintain a copy of the manufacturer's specifications for operation and maintenance of the lamp disposer including the control device. 3. The Company shall record routine and non-routine maintenance performed on the lamp disposer including the control device. Operational Limitations from Permit APC-95/0569: 1. The Company shall not operate the fluorescent light bulb crushing unit without the charcoal filter system.

DaimlerChrysler provided information concerning their preventative maintenance system. The facility utilizes a Total Maintenance System (TMS), which is a computer system designed to maintain equipment uptime and to perform the maintenance findings in a way that maximizes the performance of the equipment and the quality of its output. The system performs four functions: 1) identification of all equipment requiring maintenance, 2) scheduling of maintenance activities, 3) recording maintenance status, and 4) communicating equipment status.

An annual demonstration of compliance as indicated by Chrysler for some of the particulate emission sources is not an adequate demonstration of compliance. EPA's guidance concerning periodic monitoring and practical enforceability for purposes of federal enforceability clearly state that a once a year demonstration of compliance is not sufficient. The time frame of the compliance demonstration should in some way match the emission standard or work practice standard (ie hourly monitoring for pound per hour {lb/hr} emission limitations). Compliance is discussed further under the next section.

Emission Limitations - Particulate - State Enforceable Only:

The attached permit contains the following emission limitations expressed in both gr/scf and tpy.

Emission Unit No./Description	Outlet Emission Rate (gr/scf)	Outlet Emission Rate (tpy)
Emission Unit No. 6 Dinamec	0.073	2.1
Emission Unit No. 7 Finish Welding	0.096 lb/hr/station	0.096 lb/hr/station
Emission Unit No. 8 Inspection and Grinding	0.096 lb/hr/station	0.096 lb/hr/station
Emission Unit No. 9 Maintenance Paint Spray Booth	0.000003 gr/scf	0.09
Emission Unit No. 12 E-Coat Sanding	0.096 lb/hr/station	0.096 lb/hr/station
Emission Unit No. 15 Powder Anti-Chip	0.001 gr/scf	0.36
Emission Unit No. 16 Main Sand Booth	0.096 lb/hr/station	0.096 lb/hr/station
Emission Unit No. 17 Repair Sand Booth	0.096 lb/hr/station	0.096 lb/hr/station
Emission Unit No. 18 Topcoat System	0.001 gr/scf	26.33
Emission Unit No. 20 Blackout Application	0.001 gr/scf	0.96
Emission Unit No. 22 Low Bake Repair	0.001 gr/scf	0.86
Emission Unit No. 23 Touch Up Booth	0.00006 gr/scf	0.07
Emission Unit No. 24 Paint Sludge Dryer	<0.3 lb/mmbtu	0.23 (using 0.011 lb/mmbtu)
Emission Unit No. 28 Lamp Disposer	<0.2 gr/scf	<1.0

The above table does not contain the particulate emissions from fuel burning equipment. Chrysler provided an emission estimate of 4.09 tons of particulate from fuel burning sources other than the powerhouse (air supply houses, oven burners, RTO, etc.)

Total particulate emission rate from Emission Units Nos. 7, 8, 12, 16, and 17 is 2.79 tons.

Per Regulation No. 30 Section 6(a)(3)(i)(B), the Department proposes the following periodic monitoring:

Monitoring: none required. Recordkeeping will suffice.

Testing:

The Department has proposed that compliance with Regulation No. 5 be demonstrated through operation and maintenance of the equipment above and corresponding control devices (where applicable) in accordance with the manufacturer's specifications as discussed under previously. Testing is recommended for the topcoat system since the majority of the particulate emissions are generated by this process.

Recordkeeping:

For all emission units:

Record routine and non-routine maintenance.

Record of manufacturer's recommended operation and maintenance procedures.

Specific Recordkeeping for emission units:

Emission Unit No. 6: Proper operation and maintenance.

Emission Units Nos. 7, 8, 12, 16, and 17:

Record of hours of operation each month.

Record of raw material used each month.

Record of daily operating status of each emission unit updated monthly.

Emission Unit Nos. 9, 15, 18, 20, 22, 23:

Record of water wash system integrity and record results once a month.

Record of paint usage, transfer efficiency, calculations, any test data, any assumptions.

Emission Unit No. 24:

Record of fuel usage

Emission Unit No. 28:

Record of the number and type of bulbs crushed on a daily basis.

Compliance Method:

Once a month calculate the particulate emission rate for each of the emission units based upon the recordkeeping. Compliance with the manufacturer's operation and maintenance procedures will be used to indirectly certify compliance with the emission factors or rates (gr/scf) corresponding to each emission unit. Compliance with the manufacturer's operation and maintenance procedures should ensure that any control devices (filters, water wash system, cyclones, etc.) are operated in a manner to achieve the removal efficiency as designed.

Regulation No. 12: Control of Nitrogen Oxide Emissions Regenerative Thermal Oxidizer (abatement for Emission Unit Nos. 11, 15, and 18): total rated heat input capacity of 12 mmbtu/hr Emission Unit No. 11 - E-Coat Oven - total rated heat input capacity of 29.6 mmbtu/hr Emission Unit No. 15 - Powder Anti Chip Oven - total rated heat input capacity of 37.3 mmbtu/hr Emission Unit No. 18 - Topcoat System - total rated heat input capacity of 33 mmbtu/hr for each of the two booths Emission Unit No. 24 - Paint Sludge Dryer - total rated heat input capacity of 4.7 mmbtu/hr	
Section 3.3(b)	15 < 50 mmbtu/hr: Emissions shall not exceed those achieved through an annual tune-up by qualified personnel. Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): Monitoring: The tune-up shall be conducted in accordance with manufacturer's specifications. Testing: None in addition to that required by Condition 3(b)(1)(ii). Recordkeeping: The Company shall maintain a log of the date and detail of the tune-up for each emission unit. The Company shall maintain a file of the qualifications of the personnel performing the annual tune-up. The Company shall maintain a record of the manufacturer's rated heat input capacity to verify compliance with this section. For purposes of applicability, this regulation applies to the entire oven. All burners within the oven are totaled to determine the overall rated heat input capacity of the oven. Applicability is not governed by individual burner rating.
Section 4.1(c)	<15 mmbtu/hr: Fueling burning equipment is exempt from RACT requirements. Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): Monitoring/Recordkeeping: The Company shall maintain a record of the manufacturer's rated heat input capacity to verify compliance with this section.
Section 7.1	Previously submitted - compliance through Section 3.6
Section 7.2	Recordkeeping for five (5) years - transferred
Section 7.3	Reporting - transferred
Section 7.4(a)	A continuous emission monitor (CEM) is not required. This section is not included in the attached draft permit.
Section 7.4(b)	Test methods transferred into the permit. Frequency of testing per Regulation No. 17 Section 2.1 - Condition 3(b)(1)(ii).

Regulation No. 14 - Visible Emissions	
Section 2.1: *No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20) percent for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty four (24) hour period.*	Compliance Methodology: Emission Units Nos. 6, 7, 8, 12, 17, 19, 28: These emission units emit particulate from sanding, welding, and grinding operations. The potential to exists for opacity if the units and control devices (filters, cyclones, etc.) are not operated and maintained properly. Emission Units Nos. 9, 11, 18, 20, 22, 23, 24: These emission units have the potential for opacity due to paint overspray and fuel burning in the ovens. However, the paint overspray is controlled in these sources and the burners fire natural gas, which is considered a "clean" fuel. Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B), the Department proposes the "Method 22 Like" approach in combination with proper operation and maintenance: 1) The Company be required to maintain and operate these emission units in accordance with the manufacturer's specifications. 2) Once every calendar quarter the emission points corresponding to these emission units be surveyed for a minimum of twenty (20) minutes during production/operation to observe the absence or presence of visible emissions. If visible emissions are detected, the Company shall take corrective measures. These corrective measures shall include replacement of filters, shutting down the particular emission unit, or conducting a Reference Method 9 to determine whether a violation of the standard exists. Records of the survey (noting presence or absence of visible emissions) and corresponding corrective measures taken shall be maintained. Emission Units Nos. 15 and 16: The Company proposes on Exhibit AQM-1001X in the May 1998 supplemental information to conduct monthly visible emissions testing per EPA Reference Method 9. The permit reflects this proposal. Emission Unit No. 10 - Phosphate Line: the facility proposed in the May 1998 supplemental information (Exhibit AQM-1001X) to conduct monthly visible emissions testing per EPA Reference 9. This proposal has not been transferred to the permit - because the emission unit is comprised of a dip tank and no ovens for curing. The Department, in lieu, proposes that any visible emissions detected shall be monitored, recorded, and reported (if necessary) - no frequency is specified. Emission Units Nos. 13, 14, 25, 26, 27, 60: These operations are strictly VOC related (the paint mix building, gasoline fill operations, etc.) and are fugitive in nature. These emission units do not involve particulate emissions from paint overspray, sanding, or fuel burning operations. It is not likely that opacity associated with these sources provided they are operated and maintained in accordance with manufacturer's specifications and/or regulatory requirements. Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): The Department does not propose evaluation of these sources at any frequency. If visible emissions are observed, then Reference

	Method 9 shall be used to determine the opacity.
Section 4.1: *For purposes of this regulation, compliance with the opacity standard shall be in accordance with Subsection 1.5(c) of Regulation No. 20.*	The requirements of this section have been transferred into the attached draft operating permit.

Volatile Organic Compound Emissions:

Regulation No. 24, 40 CFR Part 60, and Regulation No. 25 (LAER) requirements for Emission Units 9, 11, 13, 15, 18, 20, 22, 23, 24, 25, 26, 27, and 60 are presented in a tabular format in order to show differences/similarities where appropriate.

Emission Unit No. 11: Application of an electrocoat primer coating and water rinse stages. Vehicle is cured in an oven heated with eleven (11) burners with a rated heat input capacity of between 2 and 3.6 mmbtu/hr for a total rated heat input capacity of 29.6 mmbtu/hr.			
	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
Emission Standard	Reg. 24 Section 13(c)(4) No owner or operator of an EDP prime coat operation shall cause or allow on any day the application of any coating on that operation with VOC content, as applied, that exceeds either of the following: A. 1.4 lb/gal of coating solids when the solids turnover ratio (R_T) is calculated as follows:  where: T_V = Total volume of coating solids that is added to the EDP system in a calendar month. L_E = Volume design capacity of the EDP System. B. 0.17 x 0.350($^{0.160-R_T}$)kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160. C. When R_T is less than 0.040, there is no emission limit.	No owner or operator shall discharge or cause the discharge into the atmosphere from the EDP Prime Coat Operation in excess of: A. 0.17 kilogram of VOC per liter of applied coating solids when R_T is 0.16 or greater. B. 0.17 x 0.350($^{0.160-R_T}$)kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160. C. When R_T is less than 0.040, there is no emission limit. *[Reference 40 CFR 60.392(a) dated 10/11/94]*	1.34 lb VOC/gacs
Compliance Method	Capture and Control	Capture and Control	Compliance through capture and control

Emission Unit No. 11: Application of an electrocoat primer coating and water rinse stages. Vehicle is cured in an oven heated with eleven (11) burners with a rated heat input capacity of between 2 and 3.6 mmbtu/hr for a total rated heat input capacity of 29.6 mmbtu/hr.			
	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
Testing:	Section 13(f) - requirements of 60.393(c)(2)	The reference methods and procedures listed in 40 CFR 60.396 shall be used when this equipment is stack tested. *[Reference 40 CFR 60.396 dated 12/24/80]*	Test Method: EPA Reference Method 24. Quarterly samples of "as-applied" coatings of e-coat in use at the time and analyze for percent water by weight, percent volatiles by weight, percent non-volatiles by weight, and density of the coating (lb/gal) using EPA Reference Method 24.
Monitoring:	Section 13(f) - requirements of 60.393(c)(2)	A. The owner or operator shall calibrate, maintain, and operate temperature measurement device. The temperature measurement device shall be installed in the firebox. B. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5°C. C. The temperature measurement device shall be equipped with a recording device so that a permanent record is produced. *[Reference 40 CFR 60.394 dated 12/24/80]*	

Emission Unit No. 11: Application of an electrocoat primer coating and water rinse stages. Vehicle is cured in an oven heated with eleven (11) burners with a rated heat input capacity of between 2 and 3.6 mmbtu/hr for a total rated heat input capacity of 29.6 mmbtu/hr.

	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
Recordkeeping:	Reg. 24 Section 13(e)(i)(2) i. For each day, the total daily volume of coating solids that is added to the EDP System. ii. For each month, calculation of R_T using the equation above. iii. For each month, the calculations used in the compliance determination	A. The owner or operator shall identify and record each instance in which the volume weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.392. [*Reference 40 CFR 60.395(b) dated 12/13/90]* B. The owner or operator shall continuously record the incinerator combustion temperature during coating operations. *[Reference 40 CFR 60.395(c) dated 12/13/90]*	Records of the quarterly coating sampling and calculations of VOC content "as applied".
Reporting	Reg. 24 Section 13(e)(i)(3)(i) Any record showing noncompliance with the appropriate emission limit. *This section does not contain a reporting timeframe. A timeframe of 45 days has been included in the attached permit, which is consistent with similar reporting requirements of Regulation No. 24 Section 13.	A. The owner or operator shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.392. *[Reference 40 CFR 60.395(b) dated 12/13/90]* B. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. Where compliance is achieved through the use of a capture system and control device, the volume weighted average after the control device should be reported. *[Reference 40 CFR 60.395(b) dated 12/13/90]*	Submit within sixty (60) days following the sampling the results of Reference Method 24 and calculations of VOC content. Calculations and any assumptions shall be shown.

Emission Unit No. 11: Application of an electrocoat primer coating and water rinse stages. Vehicle is cured in an oven heated with eleven (11) burners with a rated heat input capacity of between 2 and 3.6 mmbtu/hr for a total rated heat input capacity of 29.6 mmbtu/hr.

	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
		C. The owner or operator shall submit a written report at the frequency specified in 40 CFR 60.7(c) and as defined below: 1. Every three hour period shall be reported ruing which the average temperature measured is more than 28°C less than the average temperature during the most recent control device performance test at which the destruction efficiency was determined as specified in 40 CFR 60.393. [Reference 40 CFR *60.395(b) dated 12/13/90]* 2. If no such periods occur, the owner or operator shall submit a negative report. [Reference 40 CFR 60.395(c)(3) dated 12/13/90] D. The owner or operator shall notify the Administrator 30 days in advance of any test by Reference Method 25. [Reference 40 CFR 60.395(d) dated 12/13/90]	

Emission Unit No. 15: Powder Anti-Chip Booth - Powder Anti-Chip is applied using spray technology. The coating is then cured in an oven. A solventborne primer (about 5.6 lb VOC/gal) is applied manually prior to this booth. The VOC content of the powder anti-chip is about 0.001 lb/gal.

	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
Emission Standard	Reg. 24 Section 13 (c)(3)(i) 15.1 lb VOC/gal of solids deposited	1.4 kg of VOC/l of applied coating solids.	Use of powder anti-chip
Compliance Method	Reg. 24 Section 13(e) Control Device: i. Installing and operating a capture system on that operation. ii. Installing and operating a control device on that operation. iii. Determining for each day the overall emission reduction efficiency needed to demonstrate compliance. The overall emission reduction needed for a day is the lesser of the value calculated according to the procedure in **Appendix "C" (c)** of this regulation for that day or 95 percent. iv. Demonstrating each day that the overall emission reduction efficiency achieved for that day, as determined in **Appendix "D" (c)** of this regulation, is greater than or equal to the overall emission reduction efficiency required for that day.	Compliance through capture and control	Compliance through low VOC containing material and powder anti-chip.
Testing:	Reg. 24 Section 13(g)(2) Use the topcoat protocol to determine compliance.	The reference methods and procedures listed in 40 CFR 60.396 shall be used when this equipment is stack tested. *[Reference 40 CFR 60.396 dated 12/24/80]*	Same as that required by Regulation No. 24 and 40 CFR Part 60 Subpart MM
Monitoring:	Reg 13 Section 13(e)(ii) - Monitor Temperature of RTO The Company shall monitor the combustion	A. The owner or operator shall calibrate, maintain, and operate temperature measurement device. The temperature measurement device shall be	Same as that required by Regulation No. 24 and 40 CFR Part 60 Subpart MM

Emission Unit No. 15: Powder Anti-Chip Booth - Powder Anti-Chip is applied using spray technology. The coating is then cured in an oven. A solventborne primer (about 5.6 lb VOC/gal) is applied manually prior to this booth. The VOC content of the powder anti-chip is about 0.001 lb/gal.

	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
	temperature of the Regenerative Thermal Oxidizer using continuous temperature monitoring equipment. The data shall be stored magnetically or on paper for a period of five (5) years. *[Reference Regulation No. 24 Appendix D(b)(2)(i)(A) dated 11/29/94 and Permit APC-95/0569]* An owner or operator subject to this Section shall ensure that: i. A capture system and control device are operated at all times the coating operation is in use, and the owner or operator demonstrates compliance with this Section through the applicable coating analysis and capture system and control device efficiency test methods specified in **Appendix "B"**, **Appendix "D"** and **Appendix "E"** of this regulation and in accordance with the capture efficiency test methods in **Appendix "D"**. ii. The control device is equipped with the applicable monitoring equipment specified in **Appendix "D" (b)** of this regulation, and the monitoring equipment is installed, calibrated, operated, and maintained according to the vendor's specifications at all times the control device is in use.	installed in the firebox. B. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5°C. C. The temperature measurement device shall be equipped with a recording device so that a permanent record is produced. *[Reference 40 CFR 60.394 dated 12/24/80]*	

Emission Unit No. 15: Powder Anti-Chip Booth - Powder Anti-Chip is applied using spray technology. The coating is then cured in an oven. A solventborne primer (about 5.6 lb VOC/gal) is applied manually prior to this booth. The VOC content of the powder anti-chip is about 0.001 lb/gal.

	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
Recordkeeping	Reg. 24 Section 13(j)(ii)(A) - Calculations, test results, and data in accordance with the Topcoat Protocol Reg. 24 Section 13(j)(ii)(B) & Reg 24 Section 4(e)(2)(vi) through (xi) - maintain records of control device temperatures and maintenance	A. The owner or operator shall identify and record each instance in which the volume weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.392. [*Reference 40 CFR 60.395(b) dated 12/13/90]* B. The owner or operator shall continuously record the incinerator combustion temperature during coating operations. *[Reference 40 CFR 60.395(c) dated 12/13/90]*	Same as required by Regulation No. 24 and 40 CFR Part 60 Subpart MM

Emission Unit No. 15: Powder Anti-Chip Booth - Powder Anti-Chip is applied using spray technology. The coating is then cured in an oven. A solventborne primer (about 5.6 lb VOC/gal) is applied manually prior to this booth. The VOC content of the powder anti-chip is about 0.001 lb/gal.

	Regulation No. 24 Requirements RACT	40 CFR Part 60 Requirements NSPS	Regulation No. 2/LAER Requirements
Reporting	Reg 24 Section 13(j)(1)(iii) - Reporting noncompliance within 45 calendar days	A. The owner or operator shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.392. *[Reference 40 CFR 60.395(b) dated 12/13/90]* B. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. Where compliance is achieved through the use of a capture system and control device, the volume weighted average after the control device should be reported. *[Reference 40 CFR 60.395(b) dated 12/13/90]* C. The owner or operator shall submit a written report at the frequency specified in 40 CFR 60.7(c) and as defined below: 1. Every three hour period shall be reported ruing which the average temperature measured is more than 28°C less than the average temperature during the most recent control device performance test at which the destruction efficiency was determined as specified in 40 CFR 60.393. [Reference 40 CFR 60.395(c)(1) dated 12/13/90]	Same as that required by Regulation No. 24 and 40 CFR Part 60 Subpart MM

Emission Unit No. 18: Topcoat System - the facility uses two identical booths to apply waterborne basecoats. This area is followed by a heated flash zone. Solvent clearcoat is then applied. The vehicle is then cured in a natural gas fired oven. VOC emissions are generated from the coating of the basecoat and clearcoat. Particulate emissions are generated from paint overspray. A waterwash system and filters are used to control particulate emissions.			
	Regulation No. 24 Requirements Reasonably Available Control Technology (RACT)	40 CFR Part 60 Requirements - New Source Performance Standards (NSPS)	Regulation No. 2/LAER Requirements
Emission Standard	Reg. 24 Section 13(c)(2)(i) 15.1 lb VOC/gal of solids deposited (gacs)	40 CFR 60.392(c) 1.47 kg VOC/l of applied coating solids.	8.45 lb/gacs by 9/1/03, 7.0 lb/gacs if able to switch to powder clearcoat by 9/1/02, submit a plan to meet 6.0 lb/gacs if unable to switch to powder clearcoat

Emission Unit No. 18: Topcoat System - the facility uses two identical booths to apply waterborne basecoats. This area is followed by a heated flash zone. Solvent clearcoat is then applied. The vehicle is then cured in a natural gas fired oven. VOC emissions are generated from the coating of the basecoat and clearcoat. Particulate emissions are generated from paint overspray. A waterwash system and filters are used to control particulate emissions.

	Regulation No. 24 Requirements Reasonably Available Control Technology (RACT)	40 CFR Part 60 Requirements - New Source Performance Standards (NSPS)	Regulation No. 2/LAER Requirements
Compliance Method	Reg. 24 Section 13(e) Control Device: i. Installing and operating a capture system on that operation. ii. Installing and operating a control device on that operation. iii. Determining for each day the overall emission reduction efficiency needed to demonstrate compliance. The overall emission reduction needed for a day is the lesser of the value calculated according to the procedure in **Appendix "C" (c)** of this regulation for that day or 95 percent. iv. Demonstrating each day that the overall emission reduction efficiency achieved for that day, as determined in **Appendix "D" (c)** of this regulation, is greater than or equal to the overall emission reduction efficiency required for that day.	Compliance through capture and control	Compliance through Regulation No. 24 and 40 CFR Part 60 Subpart MM
Testing:	Reg. 24 Section 13(g)(2) Use the topcoat protocol to determine compliance.	The reference methods and procedures listed in 40 CFR 60.396 shall be used when this equipment is stack tested. *[Reference 40 CFR 60.396 dated 12/24/80]*	Coating Samples: EPA Reference Method 24. Quarterly sampling of "as applied" coatings in use at the time and analyze for percent water by weight, percent non-volatiles by weight, percent volatiles by weight, density of coating (lb/gal) using EPA Reference Method 24. Other testing as required by Regulation No. 24 and 40 CFR Part 60 Subpart MM

Emission Unit No. 18: Topcoat System - the facility uses two identical booths to apply waterborne basecoats. This area is followed by a heated flash zone. Solvent clearcoat is then applied. The vehicle is then cured in a natural gas fired oven. VOC emissions are generated from the coating of the basecoat and clearcoat. Particulate emissions are generated from paint overspray. A waterwash system and filters are used to control particulate emissions.

	Regulation No. 24 Requirements Reasonably Available Control Technology (RACT)	40 CFR Part 60 Requirements - New Source Performance Standards (NSPS)	Regulation No. 2/LAER Requirements
Monitoring:	Reg 13 Section 13(e)(ii) - Monitor Temperature of RTO An owner or operator subject to this Section shall ensure that: i. A capture system and control device are operated at all times the coating operation is in use, and the owner or operator demonstrates compliance with this Section through the applicable coating analysis and capture system and control device efficiency test methods specified in **Appendix "B"**, **Appendix "D"** and **Appendix "E"** of this regulation and in accordance with the capture efficiency test methods in **Appendix "D"**. ii. The control device is equipped with the applicable monitoring equipment specified in **Appendix "D" (b)** of this regulation, and the monitoring equipment is installed, calibrated, operated, and maintained according to the vendor's specifications at all times the control device is in use.	A. The owner or operator shall calibrate, maintain, and operate temperature measurement device. The temperature measurement device shall be installed in the firebox. B. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications. The device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5^{o}C. C. The temperature measurement device shall be equipped with a recording device so that a permanent record is produced. *[Reference 40 CFR 60.394 dated 12/24/80]*	Same as required by Regulation No. 24 and 40 CFR Part 60 Subpart MM

Emission Unit No. 18: Topcoat System - the facility uses two identical booths to apply waterborne basecoats. This area is followed by a heated flash zone. Solvent clearcoat is then applied. The vehicle is then cured in a natural gas fired oven. VOC emissions are generated from the coating of the basecoat and clearcoat. Particulate emissions are generated from paint overspray. A waterwash system and filters are used to control particulate emissions.

	Regulation No. 24 Requirements Reasonably Available Control Technology (RACT)	40 CFR Part 60 Requirements - New Source Performance Standards (NSPS)	Regulation No. 2/LAER Requirements
Recordkeeping	Reg. 24 Section 13(j)(ii)(A) - Calculations, test results, and data in accordance with the Topcoat Protocol Reg. 24 Section 13(j)(ii)(B) & Reg 24 Section 4(e)(2)(vi) through (xi) - maintain records of control device temperatures and maintenance	A. The owner or operator shall identify and record each instance in which the volume weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.392. [*Reference 40 CFR 60.395(b) dated 12/13/90]* B. The owner or operator shall continuously record the incinerator combustion temperature during coating operations. *[Reference 40 CFR 60.395(c) dated 12/13/90]*	Record results of quarterly sampling with calculated "as applied" VOC content. Other as required by Regulation No. 24 and 40 CFR Part 60 Subpart MM.
Reporting	Reg 24 Section 13(j)(1)(iii) - Reporting noncompliance within 45 calendar days	A. The owner or operator shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.392. *[Reference 40 CFR 60.395(b) dated 12/13/90]* B. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. Where compliance is achieved through the use of a capture system and control device, the volume weighted average after the control device should be reported. *[Reference 40 CFR*	Submit the results of the quarterly sampling within sixty (60) days following the sampling and to include the calculated VOC content of each sample. Calculations and any assumptions shall be shown. Other as required by Regulation No. 24 and 40 CFR Part 60 Subpart MM.

Emission Unit No. 18: Topcoat System - the facility uses two identical booths to apply waterborne basecoats. This area is followed by a heated flash zone. Solvent clearcoat is then applied. The vehicle is then cured in a natural gas fired oven. VOC emissions are generated from the coating of the basecoat and clearcoat. Particulate emissions are generated from paint overspray. A waterwash system and filters are used to control particulate emissions.

	Regulation No. 24 Requirements Reasonably Available Control Technology (RACT)	40 CFR Part 60 Requirements - New Source Performance Standards (NSPS)	Regulation No. 2/LAER Requirements
		60.395(b) dated 12/13/90] C. The owner or operator shall submit a written report at the frequency specified in 40 CFR 60.7(c) and as defined below: 1. Every three hour period shall be reported ruing which the average temperature measured is more than 28°C less than the average temperature during the most recent control device performance test at which the destruction efficiency was determined as specified in 40 CFR 60.393. [Reference 40 CFR 60.395(c)(1) dated 12/13/90] 2. If no such periods occur, the owner or operator shall submit a negative report. [Reference 40 CFR 60.395(c)(3) dated 12/13/90] D. The owner or operator shall notify the Administrator 30 days in advance of any test by Reference Method 25. [Reference 40 CFR 60.395(d) dated 12/13/90]	

The facility does not coat any plastic parts at the facility. Any plastic parts coated are in body position and therefore subject to Regulation No. 24 Section 13. The requirements of Regulation No. 24 Section 12, Plastic Parts Coating, is not contained in the attached permit.

Emission Units No. 22 and 23: Low-Bake Repair and Touch Up Booth	
	Regulation No. 24 Requirements RACT
Emission Standard	Reg. 24 Section 13(c)(1)(ii) 4.8 lb VOC/gal of coating, excluding water and exempt compounds, as applied.
Compliance Method	Daily Weighted Average Reg. 24 Section 13(d)
Monitoring:	Recordkeeping of Reg 24 Section 13(h)(3) & Reg 24 Section 4(d) Suffices
Testing:	Regulation No. 24 Section 13 Regulation No. 24 Appendices A through C Material Safety Data Sheets from the manufacturer shall suffice for the coatings used in the Touch Up Area (since these are mainly spray cans and are used "as supplied" from the manufacturer.) - Reference Regulation No. 30 Section 6(a)(3)(i)(B)
Recordkeeping	Reg 24 Section 13(h)(3) & Reg 24 Section 4(d) Records of the calculated VOC content from the quarterly sampling in the low bake area. Records of the Material Safety Data Sheets for the coatings used in the Touch Up Area. Reference Regulation No. 30 Section 6(a)(3)(i)(B).
Reporting	Reg 24 Section 13(h)(3) & Reg 24 Section 4(d) Report within 60 days of sampling the results of the coating analysis in the low bake area including the calculated VOC content of the "as applied" coatings. - Reference Regulation No. 17 Section 2.6

The emission units above are not subject to any applicable requirements under 40 CFR Part 60.

Emission Unit No. 9 Maintenance Paint Spray Booth, Emission Unit No. 13 Sealer Deck, Emission Unit No. 20 Blackout Application, Emission Unit No. 60 Glass Installation	
Miscellaneous Metal Parts Coating:	Regulation No. 24 Requirements RACT
Emission Standard	Reg. 24 Section 22(c)(1)(iv) Extreme Performance Coating: 3.5 lb VOC/gal, excluding water and exempt compounds, as applied
Compliance Method	Daily Weighted Average Reg. Section 22(d)
Testing:	Reg. 24 Section 22(f)
Monitoring:	Recordkeeping of Regulation No. 24 Section 22(g)(3) and Section 4(d) suffices
Recordkeeping	Reg. 24 Section 22(g)(3) and Reg 24 Section 4(d) Records of the Material Safety Data Sheets for each coating used in these emission units showing the "as supplied" VOC content and method used to determine VOC content. - Reference Regulation No. 30 Section 6(a)(3)(i)(B) Regulation No. 24 Section 4(d)(2)(ii) requires that the volume applied each day be recorded. This language has been modified to read: The daily usage of individual VOC containing materials may be determined by allocating monthly usage to individual production days. For materials used in more than one emission unit, material usage may be tracked and aggregated for more than one unit. The daily weighted average VOC content may be calculated based upon these records. Typically, numerous sealers and adhesives are used through-out the facility in assembling the vehicle. Daily volume used in many cases is less than one pint per day. Monthly records, as required by the PAL, show that on the average the total monthly usage of individual sealers and adhesives is less than 1 quart per month.
Reporting	Reg. 24 Section 22(g)(3) and Reg 24 Section 4(d)

The emission units listed above are not subject to applicable requirements of 40 CFR Part 60.

Emission Unit No. 27: Gasoline Fluid Fill Operations:

Process Description:
The gasoline fluid fill operation consists of initial vehicle fueling operations and refueling of plant vehicles. This also includes the filling of the gasoline tank by the tank truck.

Applicable Requirements:
Regulation No. 2: Permits
Regulation No. 24, Section 26: Gasoline Dispensing Facility - Stage I Vapor Recovery
Regulation No. 24, Section 36: Stage II Vapor Recovery

The requirements from Regulation No. 24 Sections 26 and 36 are included in the attached permit.

Emission Unit No. 24 Paint Sludge Dryer
Emission Unit No. 25 Paint Mix Building
Emission Unit No. 26 Brake Fluid/Antifreeze/Motor Oil/Transmission Oil Fill/Windshield Fluid Fill:

Process Description:

Paint Sludge Dryer: paint sludge is dried and exhaust incinerated for odor and VOC control. Currently this unit is not operational. Paint sludge is being sent off site for recycling. The operation of this unit is retained in the attached permit - as an alternate operating scenario and in accordance with Regulation No. 30 Section 6(a)(3)(i)(B), the Department proposes that the facility keep records of the recycling as documentation that the paint sludge dryer was not operated. The facility did not identify any applicable requirements under Regulation No. 24 on Form AQM-1001V. The Department believes that Regulation No. 24 Section 50 is applicable.

Paint Mix Building: Paint is transferred from "as supplied" totes into the mix circulation system. The waterborne basecoats do not require the addition of solvent. Solvent is added to the clearcoat. Waste tanks for purge solvent and paint are housed in this building. The facility did not identify any applicable requirements under Regulation No. 24 on Form AQM-1001V. The Department believes that Regulation No. 24 Section 50 is applicable.

Brake Fluid/Antifreeze/Motor Oil/Transmission Oil Fill/Windshield Fluid Fill: filling of assembly line vehicles. VOCs released during transfer. The facility did not identify any applicable requirements under Regulation No. 24 on Form AQM-1001V. The Department believes that Regulation No. 24 Section 50 is applicable.

Applicable Requirements:
Regulation No. 2: Permits - APC-95/0569
Regulation No. 24 Section 8: Handling, Storage, and Disposal of VOCs - discussed under Section II of memorandum
Regulation No. 24 Section 50: Other Sources

The maximum theoretical emissions of VOCs from these emission units and other sources at the facility not subject to Sections 10 through 49 is less than 25 tons per year. Therefore, the recordkeeping and reporting requirements of this section are applicable. In addition, the facilitywide short-term and long-term emission limits are applicable.

V. Emission Units Nos. 29 and 30: Hot Water Generators #1 and #2 Emission Units Nos. 34 through 50: Miscellaneous Combustion Units

Process Description:

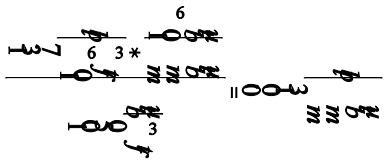
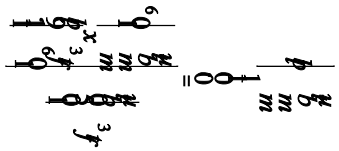
Emission Units Nos. 29 and 30 have a rated heat input capacity of 50 mmbtu/hr and Emission Units Nos. 34-50 have a rated heat input capacity of less than 50 mmbtu/hr (although a majority are less than 15 mmbtu/hr). All emission units are fired using natural gas. These units are used for building heat.

The original construction application for the hot water generators identified the rated heat input capacity of these units to be 40.2 mmbtu/hr. However, the actual units installed have a rated heat input capacity of 50 mmbtu/hr. The correct requirements corresponding to burners of this size (Regulation No. 12 Section 3.3a) are included in the attached permit. Because of the difference between the construction application and the "as built", the Department is requesting that the hot water generators (or one if it can be shown that the units are identical and represent similar operation) be stack tested to verify the emission factor used in the monthly PAL recordkeeping. This requirement is included in the attached permit.

Applicable Requirements:

Regulation No. 2:	Permit APC-95/0569
Regulation No. 4:	Sulfur Dioxide Emissions from Fuel Burning Equipment
Regulation No. 12:	Control of Nitrogen Oxide Emissions
Regulation No. 14:	Visible Emissions
Regulation No. 19:	Discussed under Section II of Memorandum

Compliance Methodology for Regulation No. 4	
Section 1.2	This regulation applies because the rated heat input capacity of the equipment is 1,000,000 but/hr and greater.
Section 1.3	The provisions of this regulation shall not apply to equipment or operations whose emissions are controlled by Regulation No. 5 or Regulation No. 7 or Regulation No. 29.
Section 1.4	For the purposes of this regulation, the heat input shall be based upon the manufacturer's guaranteed maximum input.
Section 1.5	The provisions of this regulation shall not apply to the startup and shutdown of equipment which operates continuously or in an extended steady state when emissions from such equipment during startup and shutdown are governed by an operation permit issued pursuant to the provisions of Section 2, Regulation No. 2.
Section 2.1 No person shall cause or	Compliance Determination Methodology: Using the following equations based upon emission factors from the Environmental Protection Agency's (EPA) Compilation of Air Pollutant Emission Factors, Volume I, Fifth Edition, AP-42, the burners do not exceed the emission limit of 0.3 lb/mmbtu when

Compliance Methodology for Regulation No. 4	
allow the emission of particulate matter in excess of 0.3 lb/mmbtu input, maximum 2 hour average from any fuel burning equipment.	burning natural gas. Equation No. 1 (under Section III) will be used to demonstrate compliance with the particulate emission standard of 0.3 lb/mmbtu. AP-42 Emission Factor = 13.7 lb/10^6 ft^3 , from AP-42, Fifth Edition, Table No. 1.4-2 for particulate emissions from natural gas combustion, mmbtu/hr), small industrial boilers, uncontrolled Heat content of natural gas = 1050 btu/ft^3 **Compliance Demonstration Calculation for natural gas fired fuel burning equipment with a rated heat input capacity of 10 -100 mmbtu/hr:**  **Compliance Demonstration for natural gas fired fuel burning equipment with a rated heat input capacity of 0.3-<10mmbtu/hr.:**  AP-42 Emission Factor: 11.9 lb/10^6 ft^3, Fifth Edition, Table No. 1.4-2 for particulate emissions from natural gas combustion for commercial boilers (0.3-<10mmbtu/hr). Heat Content of natural gas: 1050 btu/ft^3 This one time determination is sufficient for compliance with this regulation for the combustion of natural gas only. This regulation does not contain monitoring or recordkeeping requirements. In accordance with Regulation No. 30 Section 6(a)(3)(i)(B), the Department proposes the following as acceptable periodic monitoring: Monitoring: The Company shall continuously monitor the type of fuel burned in these emission units.

Compliance Methodology for Regulation No. 4	
	Recordkeeping: Records documenting the type and amount of fuel burned in these emission units each month is sufficient for compliance with this regulation in addition to complying with the general recordkeeping requirements of Condition 3(b)(2) of the attached permit. Reporting/Compliance Certification Requirements: There are no additional requirements to that listed in Condition 3(c)(2) and 3(c)(3) of the attached permit. Operational Limitation: In accordance with Regulation No. 30 Section 6(a) and Permit APC-95/0569, it is proposed that the facility only be allowed to burn natural gas in these emission units.

Regulation No. 12: Control of Nitrogen Oxide Emissions	
Section 3.3(a)	50 mmbtu/hr <100 mmbtu/hr: installation of either low excess air and low NO_x burner technology or flue gas recirculation technology. Permit APC-95/0569 required the installation and proper operation of both low NO_x burner technology or flue gas recirculation technology. Both were required because of the NO_x PAL limit.
Section 3.3(b)	15 < 50 mmbtu/hr: Emissions shall not exceed those achieved through an annual tune-up by qualified personnel. Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): Monitoring: The tune-up shall be conducted in accordance with manufacturer's specifications. Testing: None in addition to that required by Condition 3(b)(1)(ii). Recordkeeping: The Company shall maintain a log of the date and detail of the tune-up for each emission unit. The Company shall maintain a file of the qualifications of the personnel performing the annual tune-up. The Company shall maintain a record of the manufacturer's rated heat input capacity to verify compliance with this section.
Section 4.1(c)	< 15 mmbtu/hr: Fueling burning equipment is exempt from RACT requirements. Periodic Monitoring per Regulation No. 30 Section 6(a)(3)(i)(B): Monitoring/Recordkeeping: The Company shall maintain a record of the manufacturer's rated heat input capacity to verify compliance with this section.
Section 7.1	Previously submitted - compliance through Section 3.6
Section 7.2	Recordkeeping for five (5) years - transferred

Section 7.3	Reporting - transferred
Section 7.4(a)	A continuous emission monitor (CEM) is not required. This section is not included in the attached draft permit.
Section 7.4(b)	Test methods transferred into the permit. Frequency of testing per Regulation No. 17 Section 2.1 - Condition 3(b)(1)(ii).

Regulation No. 14: Visible Emissions	
Section 2.1: *No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20) percent for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty four (24) hour period.*	Compliance Method: Emission Units Nos. 29 and 30: The Company proposed on Exhibit AQM-1001X in the May 1998 supplemental information to conduct monthly visible emissions testing per EPA Reference Method 9 for these emission units. The permit reflects this proposal. Emission Units Nos. 34 through 50: In accordance with Regulation No. 30 Section 6(a)(3)(i)(B) and EPA's White Paper II and guidance on Periodic Monitoring, the Department proposes the following: It is not deemed practical or reasonable to require periodic visible emissions testing per EPA Reference Method 9 for these emission units because 1) these emission units fire (and are limited to) natural gas, which is considered a cleaner fuel, and 2) the manpower that would expended conducting visible emissions testing would be better suited for operation and maintenance of these units per the manufacturer's specifications. The emission standard of this regulation is still applicable and the Company certainly has the obligation to conduct testing of visible emissions if seen and report accordingly. The Department is not requiring a frequency to conduct this testing and is instead requiring compliance be demonstrated through adherence to manufacturer's operation and maintenance procedures.
Section 4.1: *For purposes of this regulation, compliance with the opacity standard shall be in accordance with Subsection 1.5(c) of Regulation No. 20.*	The requirements of this section have been transferred into the attached draft operating permit.

VI. Emission Units Nos. 51 through 59: Volatile Organic Liquid Storage

The following table provides information on Volatile Organic Liquid (VOL) Storage Tanks at the facility.

Table No. 5

Emission Unit Identification	Description	Date Installed	Size (gallons)	Size (m^3)
51	Power Steering Fluid Storage Tank	1991	10,000	37.9
52	Motor Oil	1991	10,000	37.9
53	Ethylene Glycol	1991	15,000	56.8
54	Transmission Oil Storage Tank	1991	15,000	56.8
57	Clear Resin Storage Tank	1997	15,042	56.9
CCP1	Solvent Purge Bulk Storage	1997	7,000	26.5
OWR1	Organic Waste Recovery	1996	7,500	28.4
TA/001	Pre-Wipe Storage Tank	1997	6,370	24.1
TA/002	Cleaner Bulk Tank	1997	6,370	24.1
58	Paint Pigment Storage Tank	1997	7,008	26.5
59	EDP Storage Tank	1997	103,000	389.9
16	Gasoline Storage Tank	1991	20,000	75.7
17	Gasoline Storage Tank	1991	20,000	75.7
Tanks D and E	Two (2) No. 6 Fuel Oil Storage Tanks	1951	Two (2) @ 250,000	946.4

Based upon the sizes and dates of installation for emission units 51 through 59, CCP1, OWR1, TA/001, and TA/002; the recordkeeping requirements of 40 CFR Part 60 Subpart Kb are applicable. Subpart Kb paragraph 60.116b requires only recordkeeping for sources with a capacity of less than 19,812.7 gallons (75 m^3), regardless of the vapor pressure of the material stored. The requirements of Regulation No. 24 Section 49 are not applicable in accordance with paragraph a(2)(v), which exempts sources covered by a Federal rule. 40 CFR part 60 SUBPART Kb qualifies as a Federal Rule.

The requirements of 40 CFR part 60 Subpart Kb are not applicable to emission units 16 and 17 because of paragraph 60.110b(d)(6), storage vessels located at gasoline service stations. Gasoline Service Station is defined as "any site where gasoline is dispensed to motor vehicle fuel tanks from stationary storage tanks."
Regulation No. 24 Section 49(a)(2)(ii) requires recordkeeping under Section 49(e)(2) - capacity and dimensions - because the size of the tank is less than 40,000 gallons but greater than 5,000 gallons.

The vapor pressure of the material stored in emission units D and E (the 250,000 gallon No. 6 fuel oil storage tanks) is less than 1.0 psia. Therefore, Regulation No. 24 Section 31, "Petroleum Liquid Storage in Fixed Roof Tanks," requires recordkeeping in accordance with Regulation No. 24 Section 31(e)(2) if the petroleum liquid stored is less than 1.5 psia.

Regulation No. 14: Visible Emissions	
Section 2.1: *No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20) percent for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty four (24) hour period.*	Compliance Methodology: No frequency of monitoring is specified for emission units 51 through 59, CCP1, OWR1, TA/001, and TA/002. These emission units have a low potential for opacity because of the materials stored and the use of conservation vents.
Section 4.1: *For purposes of this regulation, compliance with the opacity standard shall be in accordance with Subsection 1.5(c) of Regulation No. 20.*	The requirements of this section have been transferred into the attached draft operating permit.

VII. Emission Units Nos. 61 and 62: Miscellaneous Productive and Non Productive Items: Emission Unit No. 14: UV Inspection

Process Description:

These emission units encompass cleaning activities such as solvent wiping, spray booth cleaning, etc.

Applicable Requirements:
Regulation No. 2: Permit APC-95/0569
Regulation No. 14: Visible Emissions
Regulation No. 19: Control of Odorous Air Contaminants - Discussed Under Section II of Memorandum
Regulation No. 24, Section 8: Discussed Under Section II of Memorandum
Regulation No. 24, Section 33: Solvent Metal Cleaning
Regulation No. 24, Section 45: Industrial Cleaning Solvents

Regulatory Review:

Monitoring/Recordkeeping

A. Within fifteen (15) calendar days of the end of each calendar month the Company shall calculate the emission rate for the preceding twelve calendar months. The calculations, supporting data, and any assumptions shall be recorded.
B. Within fifteen (15) calendar days of the end of each calendar month the Company shall calculate the hourly emission rate based upon the total monthly emission rate divided by the hours of operation.
C. The Company shall record the hours of operation for the Miscellaneous Processes.

Degreasers:
Regulation No. 24, Section 33

Emission Standard: Cold Cleaning Solvent Metal Degreasers - Regulation No. 24, Section 33(c)
Method of Compliance: Observe work practice standards
Testing: per Regulation No. 30 Section 6(a)(3)(i)(B) the Department proposes the following -
Monitor Material Safety Data Sheet for every cleaning solvent.
per Regulation No. 24 Section 33(d)(5) - ASTM D323-89 for measuring solvent true vapor pressure.
Recordkeeping: per Regulation No. 30 Section 6(a)(3)(i)(B)
The Company shall maintain copies of the manufacturer supplied Material Safety Data Sheet showing the solvent content and the vapor pressure of the solvent used as determined by the above test methods.
Reporting: None in addition to that required by Regulation No. 30.

Industrial Cleanup Solvents:
Regulation No. 24, Section 45:

Chrysler Corporation did not complete screening tests or trial evaluations {Regulation No. 24 Section 45(c)(2) and (c)(3)}. In negotiating the PAL conditions and provisions, the Department and Chrysler agreed that Chrysler would implement a 40% reduction in cleaning solvent usage from the 1990 baseline. Chrysler submitted in a letter dated July 14, 1995 information concerning the UOSs (and definitions of) and the solvent usage study. Information concerning the screening tests and trial evaluations has not been submitted to the Department. The Department is taking this opportunity to add monitoring and recordkeeping requirements as well as some operational limitations to minimize solvent usage per Regulation No. 24 Section 45 (c)(3)(vii). Chrysler submitted in a letter dated July 14, 1995 information concerning the UOSs (and definitions of) and the solvent usage study. Information concerning the screening tests and trial evaluations has not been submitted to the Department. This is based upon the automotive industry entitled, "Automobile Assembly Plant Spray Booth Cleaning Emission Reduction Technology Review," EPA-453/R-94-029.

In accordance with Regulation No. 24 Section 45(c)(3)(vii), the Department proposes the following permit conditions to ensure compliance with this regulation:

i. Applicability: The requirements of this condition apply to all sources at the facility that use organic solvents for the purpose of cleaning. The requirements of this condition (except for reporting and certification of Condition 3 Table 1

(e)(3)(vii) and (e)(3)(viii), respectively) do not apply to any source that is covered under Regulation No. 24 Section 33, any non-manufacturing area cleaning operation, and any non-routine maintenance of manufacturing facilities and equipment. [Reference Regulation No. 24 Section 45(a)(1)(i),(ii), and (iii) dated 11/29/94]

The Department proposes the following minimum work practices to ensure compliance with this regulation.

ii. Work Practice Standards: The Company shall conduct cleaning at the facility in accordance to industry best practices.

A. The grates of main and auxiliary booths shall be cleaned using low or zero VOC techniques.
B. The floors of the Clean Room shall be cleaned with a low VOC cleaner.
C. Booth wall coating shall be of a low VOC content.
D. Robot and arm covers shall be used on robotic equipment.
E. Additional automation equipment (e.g. applicator housings) shall be covered.
F. A purge recovery system shall be utilized.

[Reference Regulation No. 30 Section 6(a)(1) dated 11/15/93 and Regulation No. 24 Section 45(c)(3)(vii) dated 11/29/94]

iii. General Provisions:

The following provisions of Regulation No. 24 Section 45 have been included in the attached permit. Due to upcoming coating changes possible at the facility; the cleanup solvent usage, type, and VOC content may change. These changes will require review and may, in addition to requiring review under Regulation No. 2 and Regulation No. 25, require review to determine whether a modification to the Title V operating permit may be required.

A. New, reconstructed, or modified sources shall comply with the requirements of Regulation No. 24 Section 45 beginning fifteen months after startup and shall follow the time schedule for the solvent usage study, screening tests, and trial evaluations as specified in this section. [Reference Regulation No. 24 Section 45(a)(4) dated 11/29/94]

B. An owner or operator may implement changes to its cleaning solvent proposal that have been approved and implemented under Regulation No. 24 Section 45(c)(3)(vi) and (c)(3)(vii), if the change results in no increase in emissions. In such case, no notification to the Department shall be required. The change, however, shall still be subject to any preconstruction permitting and operating permit approvals that may apply. *[Reference Regulation No. 24 Section 45 (c)(3)(viii) dated 11/29/94 and Permit APC-95/0569]*

iv. Compliance Method: Compliance with the work practice standards, applicability, and general provisions of this condition shall be demonstrated by the monitoring, testing, and recordkeeping requirements of this condition. *[Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]*

v. Testing:

Compliance with Regulation No. 24 Section 45 (c)(iv) shall be achieved by applying any of the following test methods:

A. American Society for Testing and Materials (ASTM) Method D-4828 for determining the practical wash-ability of organic coatings.
B. Method for determining the performance of alternative cleaning fluids found in Appendix "M" of Regulation No. 24.
C. Any site specific evaluation test, accepted by the Department, that is designed to compare cleaning solvent usage through material and/or procedural changes to potentially reduce VOC emissions.

[Reference Regulation No. 24 Section 45(d) dated 11/29/94]

D. 40 CFR Part 60 Appendix A Reference Method 24 or other as approved by the Department. [Reference

vi. Monitoring/Recordkeeping:

A. The Company shall maintain detailed records of organic solvent usage in accordance with the requirements listed in Regulation No. 24, Section 45, "Industrial Cleaning Solvents", paragraph (c). [Reference Regulation No. 24 Section 45(e)(1) dated 11/29/94 and Permit APC-80/0149]

The records shall, at a minimum, include the following:

I. The name and identification of each solvent material

II. A listing of the operations in which the solvents were used.

III. The pounds of VOC per gallon of each solvent demonstrated through the Material Safety Data Sheet (MSDS) or test method approved by the Department and EPA or the test method identified above.

IV. The total gallons of solvent utilized for cleaning operations.

[Reference Regulation No. 24 Section 45(e)(1) dated 11/29/94]

B. The Company shall maintain monthly organic solvent usage. *[Reference Regulation No. 24 Section 45(e)(2) dated 11/29/94 and Permit APC-95/0569]*

C. The Company shall maintain monthly records of disposal and recovery rates (in gallons). This information shall contain corresponding VOC content (in lbs/gal) information. *[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93 and Regulation No. 24 Section 45(c)(3)(vii) dated 11/29/94]*

D. The Company shall maintain monthly VOC emission calculations. *[Reference Regulation No. 24 Section 45(e)(2) dated 11/29/94 and Permit APC-95/0569]*

E. The Company shall for each shipment of waste solvent from the purge solvent recovery tank to a solvent reclaimer, obtain from the solvent reclaimer the weight percent solids, weight percent water, density of waste material shipped, total gallons of waste material shipped, pounds VOC per gallon, and the VOC credit in pounds per shipment. The Company shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density using Method 24 in 40 CFR Part 60 Appendix A. *[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93 and Regulation No. 24 Section 45(c)(3)(vii) dated 11/29/94]*

F. The Company shall obtain a statement from each of its cleaning material suppliers listing the name of each cleaning material, its VOC content, the VOC content determination method, and the quantity of cleaning material delivered to the Newark Assembly Plant. The Material Safety Data Sheet may suffice provided it contains the information required by this condition.
[Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93 and Regulation No. 24 Section 45(c)(3)(vii) dated 11/29/94]

Non-Applicable Requirements:

40 CFR Part 60 - None of the subparts are applicable.
40 CFR Part 63 - Subpart T - National Emission Standards for Halogenated Solvent Cleaning:
Information submitted by the Company indicates that this regulation is not applicable.

Regulation No. 14: Visible Emissions	
Section 2.1: *No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20) percent for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty four (24) hour period.*	Compliance Methodology: The emission units discussed under this section are related to cleaning using solvents at the facility, are fugitive in nature, and occur within the paintshop and body shop. The potential for these sources to have opacity is low. Therefore, the Department is not requiring a frequency to conduct Reference Method 9 testing for these emission units. Although the standard of this regulation is still applicable, adherence to proper operation and maintenance and Regulation No. 24 (VOC RACT requirements) should ensure compliance with this applicable requirement.
Section 4.1: *For purposes of this regulation, compliance with the opacity standard shall be in accordance with Subsection 1.5(c) of Regulation No. 20.*	The requirements of this section have been transferred into the attached draft operating permit.

VIII. INSIGNIFICANT ACTIVITIES

The Company has identified the emission units listed in Table No. 6 as insignificant activities in accordance with Regulation No. 30 Appendix A. Table No. 6 also includes the basis for qualifying the emission unit as an insignificant activity.

Table No. 6

INSIGNIFICANT ACTIVITY IDENTIFICATION	GENERAL DESCRIPTION	REGULATION NO. 30 BASIS FOR INSIGNIFICANT ACTIVITY	APPLICABLE REQUIREMENT CITATION
1 THROUGH 45	Air supply houses located throughout the facility. Natural gas fired All individually less than 15 mmbtu/hr	Appendix A(b)(1)	Regulation Nos. 4, 12
46, 47, and 48	Diesel Powered Emergency Generators 1) 403 hp 2) 237 hp 3) 237 hp	Appendix A(b)(2)	Regulation Nos. 4, 8, 12
49 through 55	Various Maintenance Shops	Appendix A(s)	Regulation No. 24 Section 33 or 45 - discussed under Section VII of memo.
56	Lab Hoods in Wastewater Treatment	Appendix A(g)	NAR
57 through 60	Diesel Fuel Storage Tanks 1) 1000 gallons 2) 300 gallons 3) 350 gallons 4) 350 gallons	Appendix A(i)	Regulation No. 8
61	Waste Treatment Bench Oven	White Paper Trivial List	NAR
62	Sulfuric Acid Storage Tank	White Paper Trivial List	
63	Water Treatment Tank	Appendix A(bb)	NAR
64	Cooling Towers (Powerhouse)	Appendix A(dd)	Regulation No. 5
65 through 68	Powerhouse Laboratory	Appendix A(g)	NAR
69 through 72	Hazardous Waste Accumulation Area Flammable Storage Building Raw Material Storage Building Empty Drum Storage Pad	Appendix A(u)	NAR
73 through 75	Waste Water Treatment Caustic Tank EDP Prime Coat HCl Tank EDP Prime Coat Caustic Tank	Appendix A(i)	NAR
76	EDP Laboratory Equipment	White paper Trivial List - Bench Scale Laboratory	NAR

Table No. 6			
INSIGNIFICANT ACTIVITY IDENTIFICATION	**GENERAL DESCRIPTION**	**REGULATION NO. 30 BASIS FOR INSIGNIFICANT ACTIVITY**	**APPLICABLE REQUIREMENT CITATION**
77	EDP Cooling Towers (2)	Appendix A(dd)	Regulation No. 5
78 & 79	EDP Spray Gun Repair Shop Degreaser Pump Repair Degreaser	Appendix A(s)	Regulation No. 24 Section 33
80	Freon Storage Tank	Appendix A(i)	NAR
81	Waste Treatment Plant heater 1.106 mmbtu/hr	Appendix B(1)(i)	Regulation Nos. 4, 12
82*	Waste Oil Tank 1450 Gallons	Appendix A(i)	NAR
83 & 84	Huntsville Station Roll Station	Appendix A(h)	NAR
85	Argon Tank 6000 gallons	White Paper Trivial List Storage Tanks holding substances that emit no VOCs or HAPs	NAR
86	Water Tank 500,000 gallons	Appendix A(k)	NAR
87 through 89	Various Tanks	White Paper Trivial List - Storage Tanks holding substances that emit no VOCs or HAPs	NAR
90*	Waste Oil Tank 1450 gallons	Appendix A(i)	NAR
91 through 93	Water Storage Tanks	Appendix A(k)	NAR
94, 95, 99, 104	Clarified Water Tanks Salt/Brine Tank Brine Tank	White Paper Trivial List - Storage tanks holding substances that emit no VOCs or HAPs	NAR
96 through 98 100 through 103 105 through 126	Various Tanks	Appendix A(b)(1)	NAR
127	Body Washer Hot Water Boilers Natural Gas Fired	Appendix A(b)(1)	Regulation Nos. 4, 12
128	Dinamec 2.38 mmbtu/hr natural gas fired burner	Appendix A(b)(1)	Regulation Nos. 4, 12

The applicable requirements of Regulation No. 24 Section 33 for degreasers is discussed under Section VII of this memorandum. The shop degreasers, although insignificant activities, are not exempt from complying with the requirements of Regulation No. 24 Section 33.

NAR: No Applicable Requirements

*Insignificant Activities 82 and 90: Regulation No. 24 Section 49 does not apply to storage vessels with a capacity of less than 5,000 gallons.

Insignificant Activities & Periodic Monitoring:

Per EPA's White Paper 2 for Improved Implementation of Part 70 Operating Permits Program dated March 5, 1996 states under Section II C for "Insignificant Activities" that the "permitting authority can use broad discretion in determining the nature of any required periodic monitoring. The EPA's policy on Insignificant Emission Units (IEUs) is based on the belief that these emission points are typically associated with "inconsequential environmental impacts." Appropriate periodic monitoring - in the form of recordkeeping, which is acceptable per Regulation No. 30 Section 6(a)(3)(i)(B) - is proposed for the following applicable requirements.

Regulation No. 4	
Section 1.2	This regulation applies because the rated heat input of the equipment is 1,000,000 btu/hr and greater.
Section 1.3	The provisions of this regulation shall not apply to equipment or operations whose emissions are controlled by Regulation No. 5 or Regulation No. 7 or Regulation No. 29. This regulation applies to miscellaneous air combustion units.
Section 1.4	For the purposes of this regulation, the heat input shall be based upon the manufacturer's guaranteed maximum input of the Department's calculated input.
Section 1.5	The provisions of this regulation shall not apply to the startup and shutdown of equipment which operates continuously or in an extended steady state when emissions from such equipment during startup and shutdown are governed by an operation permit issued pursuant to the provisions of Section 2, Regulation No. 2.
Section 2.1	No person shall cause or allow the emission of particulate matter in excess of 0.3 lb/mmbtu input, maximum 2 hour average, from any fuel burning equipment. Compliance Determination Methodology: Using the following equations based on emission factors from the Environmental Protection Agency's (EPA) Compilation of Air Pollutant Emission Factors, Volume I, Fifth Edition, AP-42, the burners do not exceed the emission limit of 0.3 lb/mmbtu when burning natural gas.

Regulation No. 8, Sulfur Dioxide Emissions from Fuel Burning Equipment	
Section 1.2: *The provisions of this regulation shall not apply to the start-up and shutdown of equipment which operates continuously or in an extended steady state when emissions from such equipment during startup and shutdown are governed by an operation permit issued pursuant to the provisions of Section 2, Regulation No.2*	Regulation No. 2 permits issued to this facility do not contain separate provisions for emissions from start-up and shutdown. Therefore, the provisions of this regulation apply during all periods of operation, including start-up and shutdown.
Sections 1.3 and 1.4:	Not applicable.
Section 2.1:	Not applicable.

Regulation No. 8, Sulfur Dioxide Emissions from Fuel Burning Equipment	
Section 2.2: *No person shall offer for sale, sell, deliver or purchase, or use in any fuel burning equipment, distillate fuel oil having a sulfur content greater than 0.3 percent by weight.*	Compliance Determination Methodology: This regulation does not contain monitoring requirements or recordkeeping requirements. In accordance with Regulation No. 30, Section 6(a)(3)(i)(B), the Department proposes the following as acceptable periodic monitoring: Monitoring/Testing: The method used to determine the sulfur content must be one of the following ASTM methods: D129-91, D1552-90, D2622-92, D4294-90. Recordkeeping: The Company shall maintain all of the following records: Fuel supplier certification for each distillate fuel oil shipment received at the facility. Such certification shall include: Name of fuel supplier Date delivered Amount delivered Oil sampling method The sulfur content of the distillate fuel oil The method used to determine the sulfur content There are not additional reporting/certification requirements to those listed in Conditions 3(c)(2) and 3(c)(3) of the attached permit.
Section 2.3: *Oil Sampling Method - oil samples shall be obtained using proper American Society for Testing and Materials (ASTM) methods or alternative methods approved by the Department*	Included in the Compliance Determination Methodology discussed above.
Section 2.4: *Sulfur concentration of residual and distillate fuels shall be determined by the x-ray absorption and/or the parr oxygen bomb technique.*	The Department recently issued a policy memorandum entitled Division of Air and Waste Management (DAWM) Policy for Alternate Testing Methods dated September 17, 1997 signed by Nicholas A. DiPasquale, Director, allowing the use of the following ASTM methods to determine the sulfur content of the fuel oil: D129-91, D1552-90, D2622-92, D4294-90.

Regulation No. 12: Control of Nitrogen Oxide Emissions	
Section 4.1(c)	Fuel burning equipment with a rated heat input capacity of less than 15 mmbtu/hr is exempt from the demonstration of NO_x RACT
Section 4.1(d)	Stationary internal combustion engine with a rated capacity of less than 450 hp of output power is exempt from the demonstration of NO_x RACT
4.1(f)	Any fuel burning equipment or internal combustion engine with an annual capacity factor of less than 5 percent is exempt from the demonstration of NO_x RACT
Section 7.1	Previously submitted - compliance through Section 3.6

Regulation No. 12: Control of Nitrogen Oxide Emissions	
Section 7.2	Recordkeeping for five (5) years - transferred
Section 7.3	Reporting - transferred
Section 7.4(a)	A continuous emission monitor (CEM) is not required. This section is not included in the attached draft permit.
Section 7.4(b)	Test methods transferred into the permit. Frequency of testing per Regulation No. 17 Section 2.1 - Condition 3(b)(1)(ii).

Regulation No. 14: Visible Emissions	
Section 2.1: *No person shall cause or allow the emission of visible air contaminants and/or smoke from a stationary or mobile source, the shade or appearance of which is greater than twenty (20) percent for an aggregate of more than three (3) minutes in any one (1) hour or more than fifteen (15) minutes in any twenty four (24) hour period.*	Compliance Methodology: Based upon the EPA's White Paper 2, the Department is not requesting any frequency for monitoring/determining opacity levels from insignificant activities at the facility. Regulation No. 14 is still an applicable requirement and if the facility has knowledge that one or more of these sources has violated Regulation No. 14 Section 2.1, then the Company is under obligation to report it. The potential for the majority of visible emissions is from the powerhouse and possibly sources within the paintshop.
Section 4.1: *For purposes of this regulation, compliance with the opacity standard shall be in accordance with Subsection 1.5(c) of Regulation No. 20.*	The requirements of this section have been transferred into the attached draft operating permit.

IX. Future Applicable Requirements:

The Company will be subject to the requirements of the CAM rule, 40 CFR Part 64 at the time of permit renewal or sooner if a modification to the permit is requested/made. The application was administratively complete prior to April 20, 1998 and the facility has not submitted any information which would trigger another administrative review - therefore, Part 64 is not applicable at this point in time.

Based upon information from the EPA, a MACT standard for both Auto & Light Duty Truck Surface Coating and Miscellaneous Metal Parts coating under Title III of the Clean Air Act are scheduled to be proposed 11/99 and promulgated 11/2000.

A MACT standard is scheduled to be promulgated for plastic parts coating. The Regulation No. 30 application does not contain any activities which would be subject to plastic parts coating. This may become an applicable requirement if Chrysler were to coat plastic parts at this facility. This MACT standard is scheduled to be proposed 11/99 and promulgated 11/2000.

X. Compliance Schedule:

The Company has indicated that they are in compliance all applicable requirements.

XI. Permit Shield:

The Company requested a permit shield. Compliance with the terms and conditions of this permit shall be deemed compliance with the applicable requirements as provided in Table 7 of the attached permit as of the effective date of the permit.

Table 7 - Permit Shield

Emission Unit	Applicable Requirement
Emission Unit 1	Regulation No. 12, Section 3.6 Regulation No. 8, Section 2.1 Regulation No. 4, Section 2.1
Emission Unit 2	Regulation No. 12, Section 3.6 Regulation No. 8, Section 2.1 Regulation No. 4, Section 2.1
Emission Unit 3	Regulation No. 12, Section 3.6 Regulation No. 8, Section 2.1 Regulation No. 4, Section 2.1
Emission Unit 4	Regulation No. 12, Section 3.6 Regulation No. 8, Section 2.1 Regulation No. 4, Section 2.1
Emission Unit 5	Regulation No. 12, Section 3.6 Regulation No. 8, Section 2.1 Regulation No. 4, Section 2.1
Emission Unit 6	Regulation No. 5, Section 2.1
Emission Unit 7	Regulation No. 5, Section 2.1
Emission Unit 8	Regulation No. 5, Section 2.1
Emission Unit 9	Regulation No. 5, Section 2.1 Regulation No. 24 Section 22(c), (d), (g), Regulation No. 24 Section 4(c)(1), (c)(2), (c)(3), (d)(1), (d)(2), (d)(3)
Emission Unit 11	Regulation No. 4 Section 2.1 Regulation No. 24 Section 4(e)(2)(i-ix), 4(e)(1), 4(e)(3), Regulation No. 24 Section 13(c)(4)(i), (i)(2)(i-iii), 40 CFR Part 60.392(a); 60.393(b); 60.393(c)(2); 60.394(a), (b), (c); 60.395(a); 60.395(c)(1); 60.395(b); 60.395(c)(3) Regulation No. 12 Section 3.3(b)
Emission Unit 12	Regulation No. 5 Section 2.1
Emission Unit 13	Regulation No. 24 Section 50
Emission Unit 14	Regulation No. 24 Section 45
Emission Unit 15	Regulation No. 5 Section 2.1 Regulation No. 12 Section 3.3(b) Regulation No. 24 Section 13(c)(3)(iii), (j)(1)(ii)(A)(B) Regulation No. 24 Section 4(e)(1), (e)(2)(i-ix), (e)(3)
Emission Unit 16	Regulation No. 5 Section 2.1
Emission Unit 17	Regulation No. 5 Section 2.1

Table 7 - Permit Shield	
Emission Unit	**Applicable Requirement**
Emission Unit 18	Regulation No. 24 Section 13(c)(2)(ii), (d), (e)(1), (e)(2), (h)(4), (j)(4) Regulation No. 24 Section 4(e)(2), (e)(3) 40 CFR 60.392(c), 60.393, 60.394(a-c), 60.395(a - c), Regulation No. 5 Section 2.1 Regulation No. 12 Section 3.3(b)
Emission Unit 19	Regulation No. 5 Section 2.1
Emission Unit 20	Regulation No. 24 Section 22(c)(iii), (d), (g), Regulation No. 24 Section 4(c)(1), (c)(2), (c)(3), (d)(1), (d)(2), (d)(3) Regulation No. 5 Section 2.1 Regulation No. 12 Section 3.3(b)
Emission Unit 22	Regulation No. 5, Section 2.1 Regulation No. 12 Section 3.3(b) Regulation No. 24 Section 13(c)(ii-iii), (h), Regulation No. 24 Section 4(c)(1), (c)(2), (c)(3), (d)(1), (d)(2), (d)(3)
Emission Unit 23	Regulation No. 5, Section 2.1 Regulation No. 24 Section 13(c)(ii-iii), (h), Regulation No. 24 Section 4(c)(1), (c)(2), (c)(3), (d)(1), (d)(2), (d)(3)
Emission Unit 24	Regulation No. 5 Section 2.1 Regulation No. 12 Section 4 Regulation No. 24 Section 50
Emission Unit 25	Regulation No. 24 Section 50
Emission Unit 26	Regulation No. 24 Section 50
Emission Unit 27	Regulation No. 24 Section 5, (c)(1) Regulation No. 24 Section 26(c)(1)(i-iv), (d), Regulation No. 24 Section 36(c)(1),(f), (g), (h), (i)(1), (i)(2), (i)(3), (j) Regulation No. 24 Appendix J, J2, J3
Emission Unit 28	Regulation No. 5, Section 2.1
Emission Unit 29	Regulation No. 4 Section 2.1 Regulation No. 12 Section 3.3(b)
Emission Unit 30	Regulation No. 4 Section 2.1 Regulation No. 12 Section 3.3(b)
Emission Unit 60	Regulation No. 24 Section 50
Emission Unit 61 Emission Unit 62	Regulation No. 24 Section 33(c)(1), (f) Regulation No. 24 Section 45(e)
Facilitywide	Regulation No. 14 Section 2.1 Regulation No. 24 Section 8

As stated previously under Section II of this memorandum, the permit shield does not extend to any changes made pursuant to Condition 2(m)(3), Minor Permit Modifications, or Condition 4, Operational Flexibility, of this permit.

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pc: Dover File
Title V File

TITLE V PERMIT REVIEW
PERMIT APPLICATION CHECKLIST

STATE: DE

SOURCE NAME: DaimlerChrysler Corporation Newark Assembly Plant

AFS PLANT ID: 00300128

SOURCE TYPE: Automotive Manufacturer

PERMIT #: AQM-003/00128

SIC #: 3711

SOURCE LOCATION (COUNTY): New Castle

I. Is this a general permit? If yes, which one? (Go to Part III) . . . . . NO
If no, go to Part II.

II. PROGRAM IMPLEMENTATION

Does this permit contain "streamlined limits" (per White Paper #2) . . . . . NO

Does this permit contain requirements/provisions for:

1. Periodic Monitoring . . . . . YES
2. NESHAP/MACT (if so, list subparts) . . . . . NO
3. Case-by -Case MACT . . . . . NO
4. NSPS (if so, list subparts) . . . . . YES - Subpart MM
5. PSD/NSR . . . . . YES (NSR)
6. Acid Rain Phase II permit . . . . . NO
7. Potential-to-Emit Limits . . . . . YES
8. Consent Order of Agreement . . . . . NO
9. NOx RACT . . . . . YES
10. VOC RACT YES
11. Does permit application contain confidential information? . . . . . NO

III. COMPLIANCE STATUS

Is the source subject to a compliance schedule? . . . . . NO

IV. EPA REVIEW

1. Do you want EPA to review all or part of this permit? . . . . . YES
2. Are there other issues you would like to call to EPA's attention? . . . . . YES
   Please explain. PAL Provisions, Operational Flexibility Provisions, Miscellaneous Metal Parts Coatings - Prorate Monthly Usage with Daily Production to determine Daily Weighted VOC Content.

STATE CONTACT: Andrea H. Danucalov DATE: ***Prop. Issue Date***
PHONE: (302)323-4542

(for EPA use only) date entered init action ver
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Title V File
Ali Mirzakhalili
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