

CLARK COUNTY
DEPARTMENT OF AIR QUALITY
4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118
Authority to Construct for Part 70 Source
Source: 17777

Issued in accordance with the
Clark County Air Quality Regulations
(Section 12.4)

ISSUED TO: Faraday Future
18455 South Figueroa Street
Gardena, California 90248

SOURCE: Faraday Future
Apex Industrial Park
Las Vegas, Nevada 89105

RESPONSIBLE OFFICIAL:

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Permit Issuance: July 19, 2016

Expiration Date: July 18, 2021

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY



Richard D. Beckstead, Permitting Manager
Clark County Department of Air Quality

SOURCE DESCRIPTION

Faraday Future is an electric car manufacturing facility located in Apex Industrial Park, North Las Vegas, Nevada in the hydrographic area of 216 – Garnet Valley. This source falls under SIC code 3711: Automobile and Light Duty Truck Assembly and NAICS code 336111: Automobile Manufacturing. This source is a major stationary source of regulated air pollutants. This source consists of production areas and support facilities, including utilities and an on-site test track a single emergency generator rated at 463 hp, and two 15.63 MMBtu/hr boilers. The production areas of the facility include the body shop, paint shop, and assembly shop with their associated ovens. This vehicle manufacturing facility is subject to subject to 40 CFR Part 60, Subpart MM. This source is categorized as a commercial source based on its NAICS code for the emergency engine. The emergency engine is subject to 40 CFR Part 60, Subpart IIII. By complying with 40 CFR Part 60, Subpart IIII, the generator engine meets the requirements of 40 CFR Part 63, Subpart ZZZZ and the boilers are subject to 40 CFR Part 60, Subpart Dc. Even though, this is a concept of proof phase project, the source will be major for combined HAPs. Therefore, the source will be subject to 40 CFR Part 63, IIII for the painting and coating processes and 40 CFR Part 63, Subpart DDDDD for the boilers.

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I. ACRONYMS

Table I-1: List of Acronyms and Abbreviations

Acronym	Term
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
Btu	British Thermal Units
CFR	United States Code of Federal Regulations
CFM	Cubic Foot per Minute
CO	Carbon Monoxide
DOM	Date of Manufacture
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HP	Horse Power
HPLV	High Pressure, Low Volume
ICE	Internal Combustion Engine
kW	Kilowatt
NAICS	North American Industrial Classification System
NO _x	Nitrogen Oxides
Pb	Lead
PM	Particulate Matter
PM _{2.5}	Particulate Matter less than 2.5 microns
PM ₁₀	Particulate Matter less than 10 microns
PPM	Part per million
PTE	Potential to Emit
RTO	Regenerative Thermal Oxidizer
SIC	Standard Industry Classification
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TBD	To Be Determined
TOAS	Temporary Operating Alternate Scenario
VE	Visible Emissions
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. ADMINISTRATIVE REQUIREMENTS

1. No person shall begin actual construction of a New Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an ATC Permit from the Control Officer. [AQR 12.4.1.1(a)]
2. The Permittee shall post the permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. [AQR 12.4.3.1(e)(16) and 12.13]
3. The Permittee shall commence the construction, modification, or reconstruction of this source within eighteen (18) months after the date of issuance of this ATC Permit and construction shall not discontinued for a period greater than twelve (12) months. [AQR 12.4.1.1(b)]
4. The Permittee shall submit an application for a Part 70 Operating Permit within twelve (12) months after commencing operation of the modification or reconstruction authorized by the ATC, or on or before such earlier date that the Control Officer may establish. However, where an existing Part 70 Operating Permit would prohibit such construction or change in operation, the source must obtain a Part 70 permit revision before commencing operation. [AQR 12.5.2.1(a)(3)]
5. This ATC does not convey any property rights or any exclusive privilege. [AQR 12.4.3.1(e)(6)]
6. The Permittee shall pay all fees assessed pursuant to AQR Section 18. [AQR 12.4.3.1(e)(17)]

B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS

1. The Permittee shall file an application for any change in the Responsible Official of the source and may implement the change immediately upon submittal of the request. [AQR 12.4.3.4(a)(1)(D) and 12.4.3.4(a)(2)(C)]
2. The Permittee shall file an application for a transfer of ownership at least 30 days prior to the date of a change in ownership or operational control of the source and such application shall constitute a temporary ATC under the conditions of the existing permit. [AQR 12.12.2(c) and (d)]
3. The Control Officer may revise, revoke and re-issue, re-open and revise, or terminate the permit for cause. [AQR 12.4.3.1(e)(5)]
4. The Control Officer reserves the right, upon reasonable cause, to modify existing conditions and impose additional new compliance, monitoring and control requirements. [AQR 12.4.3.1(e)(10)(B)and (C)]

C. REPORTING/NOTIFICATIONS/PROVIDING INFORMATION REQUIREMENTS

1. The Permittee shall report start of construction, construction interruptions exceeding nine (9) months, and completion of construction to the Control Officer in writing not later than fifteen (15) working days after occurrence of the event. [AQR 12.4.3.1(e)(12)]
2. The Permittee shall provide written notification of the actual date of commencing operation of the source, or for any new emission unit or activity, received by the Control Officer, within fifteen (15) calendar days after such date. [AQR 12.4.3.1(e)(13)]
3. The Permittee shall provide separate written notification for commencing operation for each unit of phased construction, which may involve a series of units commencing operation at different times. [AQR 12.4.3.1(e)(14)]
4. The Permittee shall submit to the Control Officer within fifteen days (15) days after commencing operation any outstanding identification and description that was not previously available for new emission unit(s), as noted in this permit with "TBD."
5. The Permittee shall retain records of all required monitoring and performance demonstration data and supporting information for five (5) years after the date of the sample collection, measurement, report, or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment, all original strip-chart recordings for continuous monitoring instrumentation, and if applicable, all other records required to be maintained pursuant to 40 CFR 64.9(b). [AQR 12.4.3.1(e)(1)]
6. The Permittee shall allow the Control Officer upon presentation of credentials and other documents as may be required by law to enter the Permittee's premises, with or without prior notice, at any reasonable time, for the purpose of establishing compliance with AQR or this permit. Upon arrival at the facility, the Control Officer, or designated representative, shall check in at the main office (if arriving between the hours of 8:00 am and 5:00 pm on weekdays) or at the shipping office (if arriving at any other time). During the inspection, The Control Officer, or designated representative, shall comply with the applicable safety regulations of the Mine Safety and Health Administration, including the requirement to be escorted by the Permittee. The Permittee shall make an escort available promptly in order for the inspection to begin in a timely manner. Upon presentation of credentials, the Permittee shall allow the Control Officer to: [AQR 12.4.3.1(e)(8)]
 - a. Have access to and copy during normal business hours any records that are kept pursuant to the conditions of the permit;
 - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under this permit;
 - c. Sample or monitor substances or parameters to determine compliance with the conditions of the permit or applicable requirements; and
 - d. Document alleged violations using devices such as cameras or video equipment.
7. The Permittee shall provide the Control Officer, within a reasonable time, with any information that the Control Officer requests in writing to determine whether cause exists for revising, revoking and re-issuance or terminating the permit, or to determine compliance with the conditions of the permit. Upon request the Permittee shall also furnish to the Control Officer copies of any records required to be kept by the permit,

or for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [AQR 12.4.3.1(e)(7)]

D. COMPLIANCE REQUIREMENTS

1. The Permittee shall comply with all conditions contained in this ATC. Any noncompliance constitutes a violation and is grounds for an action for non-compliance, revocation and re-issuance or the termination of the permit by the Control Officer, or the re-opening or revising of the permit by the Permittee as directed by the Control Officer. [AQR 12.4.3.1(e)(3)]
2. Each of the conditions and requirements of this permit are severable and if any are held invalid, the remaining conditions and requirements continue in effect. [AQR 12.4.3.1(e)(2)]
3. The need to halt or reduce activity to maintain compliance with the conditions of the permit is not a defense to noncompliance with any condition of the permit. [AQR 12.4.3.1(e)(4)]
4. The Permittee shall report to the Control Officer (4701 West Russell Road, Suite 200 – Second Floor, Las Vegas, Nevada 89118) upon the commencement of operation any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below: [AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]
 - a. Within twenty-four (24) hours of the time the Permittee learns of the excess emissions, the report shall be communicated by phone (702) 455-5942, fax (702) 383-9994, or email: airquality@clarkcountynv.gov
 - b. Within seventy-two (72) hours of the notification required by paragraph (a) above, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted.
5. The Permittee shall report to the Control Officer with the semi-annual monitoring report all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. [AQR 12.5.2.6(d)(4)(B)(iii)]
6. A responsible official of the source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the permit are true, accurate, and complete. [AQR 12.4.3.1(e)(9)]

E. DEFINITIONS

1. Commissioning for the purposes of this permit is defined as operating equipment that results in production of cars that will not be sold.
2. Closed doors for the purpose of this permit is defined as man access doors for all the tunnels and ovens at all times during normal operation.

III. SOURCE-WIDE PTE SUMMARY

- A. The source is a major source for VOC, combined HAPs, and a minor source for PM₁₀, PM_{2.5}, NO_x, CO, and SO_x.

Table III-A-1: Potential to Emit (tons per year)

Pollutant	PM ₁₀	PM _{2.5}	NO _x	CO	SO _x	VOC	HAPs	H ₂ S	Pb
Total	15.15	6.28	62.16	68.66	0.50	242.41	41.34	0	0

IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS AND LIMITS [AQR 14.2.3.1(E)]

1. Emission Units

- a. The stationary source covered by this Part 70 ATC consists of the emission units listed in Table IV-A-1(a).

Table IV-A-1(a): Summary of Emission Units

Units	Process	Rating (MMBtu/hr)	Type	Manufacturer	Model No.	Serial No.
EU: A01	Body Shop					
EU: A02	Pre-treatment			Eisenmann		
EU: A03	E-Coat			Eisenmann		
EU: A04	Primer Surfacer			Eisenmann		
EU: A05	Basecoat			Eisenmann		
EU: A06	Clearcoat			Eisenmann		
EU: A07	Liquid Metal			Eisenmann		
EU: A08	Touch upB			Eisenmann		
EU: A09	Heavy Repair			Eisenmann		
EU: A10	Final Inspection			Eisenmann		
EU: A11	Sealing			Eisenmann		
EU: A12	Paint Mix Room			Eisenmann		
EU: A13	Sanding			Eisenmann		
EU: A14	Wet Sanding			Eisenmann		
EU: A15	Solvent Use					
EU: A15a	Purge/Gun Cleaning for the Clearcoat Booth					
	Purge/Gun Cleaning for the Basecoat Booth					
	Purge/Gun Cleaning for the Liquid Metal Booth					
EU: A16	Window Assembly					
EU: A17	Battery Adhesive					
EU: A18	Fluids Filling					
EU: A19	Assembly Shop – Primer			Eisenmann		
EU: A20	Assembly Shop – Basecoat			Eisenmann		
EU: A21	Assembly Shop – Clearcoat			Eisenmann		
EU: B01	Body Shop	14.238	Oven	TBD	TBD	TBD
EU: B02	E-Coat	13.589	Oven	Eisenmann	TBD	TBD
EU: B03	E-Coat	13.589	Oven	Eisenmann	TBD	TBD

Units	Process	Rating (MMBtu/hr)	Type	Manufacturer	Model No.	Serial No.
EU: B04	Liquid Metal	1.793	Oven	Eisenmann	TBD	TBD
EU: B05	Liquid Metal	1.793	Oven	Eisenmann	TBD	TBD
EU: B06	Primer Surfacer	9.506	Oven	Eisenmann	TBD	TBD
EU: B07	Primer Surfacer	9.506	Oven	Eisenmann	TBD	TBD
EU: B08	Sanding	9.711	Oven	Eisenmann	TBD	TBD
EU: B09	Sanding	9.714	Oven	Eisenmann	TBD	TBD
EU: B10	Flash Off	3.585	Oven	Eisenmann	TBD	TBD
EU: B11	Basecoat	8.768	Oven	Eisenmann	TBD	TBD
EU: B12	Clearcoat	8.768	Oven	Eisenmann	TBD	TBD
CU: B13	Adsorber	3.414	Burner	Eisenmann	TBD	TBD
CU: B14	RTO	5.122	Burner	TBD	TBD	TBD
CU: B15	RTO	5.122	Burner	TBD	TBD	TBD
EU: B16	Work Deck	4.78	Air Supply Unit	Eisenmann	TBD	TBD
EU: B17	Work Deck	5.429	Air Supply Unit	Eisenmann	TBD	TBD
EU: B18	Spot Repair	4.436	Air Supply Unit	Eisenmann	TBD	TBD
EU: B19	Shop	12.291	Air Supply Unit	Eisenmann	TBD	TBD
EU: B20	Shop	5.053	Air Supply Unit	Eisenmann	TBD	TBD
EU: B21	Assembly Shop	2.764	Air Supply Unit	Eisenmann	TBD	TBD
EU: B22	ASU Liquid Metal	5.634	Air Supply Unit	Eisenmann	TBD	TBD
EU: C01		15.63	Boiler	TBD	TBD	TBD
EU: C02		15.63	Boiler	TBD	TBD	TBD
EU: D01		345 kW	Genset – Emergency	Kohler	300REOZJ	TBD
		463 hp	Engine – Diesel DOM: 2015	John Deere	6090HFG86A	TBD

- b. The following units or activities are present at this source, but are deemed insignificant units or activities pursuant to AQR Section 12.4 in Table IV-A-1(b).

Table IV-A-1(b): Insignificant Activities

Rating	Description	Product
375,000 VMT/yr	Test Track	
Not to exceed 30,000 gallons	Tank	Battery Coolant
Not to exceed 15,000 gallons	Tank	Coolant – Anti-freeze
Not to exceed 15,000 gallons	Tank	Screen - Washer
Not to exceed 15,000 gallons	Tank	Transmission Fluid
Not to exceed 15,000 gallons	Tank	Brake Fluid
Not to exceed 7,000 gallons	Tank	Refrigerant

2. Control Devices

- a. The stationary source covered by this Part 70 ATC consists of the control devices listed in Table IV-A-2.

Table IV-A-2: Summary of Control Devices

CU	Device Type	Manufacturer	Model No.	Serial No.	Pollutant
B13	Carbon Adsorber	TBD	TBD	TBD	VOC, HAPs
B14	RTO	TBD	TBD	TBD	VOC, HAPs
B15	RTO	TBD	TBD	TBD	VOC, HAPs

3. Emission Limitations and Standards

- a. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. *[AQR 26.1.1]*
- b. The Permittee shall not allow actual emissions for VOCs to exceed the emissions listed in Table III-A-1, based on any consecutive 12-month total.
- c. The Permittee shall limit the VOC emissions to 0.17 kilogram of VOCs per liter of applied coating solids (1.42 pounds per gallons of applied coating solids) on a monthly weight average for the e-coat coating (EU: A03). *[40 CFR Part 60.392 and 40 CFR Part 60.393, Subpart MM]*
- d. The Permittee shall limit the VOC emissions to 1.40 kilograms of VOCs per liter of applied coating solids (11.17 pounds per gallons of applied coating solids) on a monthly weighted average for the primer surfacer operations (EU: A04). *[40 CFR Part 60.392 and 40 CFR Part 60.393, Subpart MM]*
- e. The Permittee shall limit the VOC emissions to 1.47 kilograms of VOCs per liter of applied coating solids (12.27 pounds per gallons of applied coating solids) on a monthly weighted average for the basecoat, clearcoat, liquid metal operations (EUs: A05, A06, and A07). *[40 CFR Part 60.392 and 40 CFR Part 60.393, Subpart MM]*
- f. The Permittee shall limit the organic HAP emissions to 0.036 kilogram per liter (0.30 pounds per gallon) of coating solids deposited on a monthly weighted average for electrodeposition primer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials for the adhesive and sealer materials that are not components of glass bonding systems, used in coating operations. *[40 CFR Part 63.3161, Subpart IIII]*
- g. The Permittee shall limit the organic HAP emissions to 0.06 kilogram per liter (0.50 pound per gallon) of applied coating solids on a monthly weighted average for coating operations of primer surfacer and rocker panel primer, topcoat, final repair, glass bonding primer, glass bonding adhesive, and all other coatings and thinners (e-coat not included), provided that the e-coat operation is controlled to a minimum 95% destruction efficiency on the cure oven. *[40 CFR Part 63.3171, Subpart IIII]*
- h. The Permittee shall limit the organic HAP to 0.010 kg/kg (lb/lb) on a monthly weighted average for sealers, adhesives, and deadener material used. *[40 CFR Part 63,3090(d), Subpart IIII]*

- i. The Permittee shall limit the solvents used throughout the manufacturing process for general cleaning to have a total HAP content of 1%. *[40 CFR Part 63,3094, Subpart IIII]*
- j. The 2015 emergency generator (EU: D01) shall comply with the Tier III emission standards set forth in 40 CFR 89.112 for new nonroad IC engine for the same model year and maximum engine power. The emission standards are provided in Table IV-A-3:

Table IV-A-3: Emission Standards for Emergency Generator ICE

Power (kW)	NMHC + NO _x (g/kW-hr)	CO (g/kW-hr)	PM (g/kW-hr)
225 < 450	4.0	3.5	0.20

- 4. Operational Limitations
 - a. The Permittee shall limit the production operation to 250,000 cars per any consecutive 12 months.
 - b. The Permittee shall limit the operation of the emergency generator (EU: D01) for testing and maintenance purposes to 100 hours per year. The Permittee may operate the emergency generator up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. The 50 hours per year for nonemergency situations can be used for emergency demand response up to 15 hours per year in accordance with 40 CFR 60.4211. The 50 hours per year cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. *[40 CFR Part 60, Subpart IIII]*

B. CONTROL REQUIREMENTS *[AQR 12.4.3.1(E)]*

VOCs

- 1. The Permittee shall operate the E-Coat booth operations (EUs: A03, B02, and B03) in accordance with manufacture's specifications to ensure 100 percent capture for VOCs.
- 2. The Permittee shall operate the Primer Surfacer booth operations (EUs: A04, B06, and B07) in accordance with manufacture's specifications to ensure 100 percent capture for VOCs.
- 3. The Permittee shall operate the Basecoat booth operations (EUs: A05 and B11) in accordance with manufacture's specifications to ensure 100 percent capture for VOCs.
- 4. The Permittee shall operate the Clearcoat booth operations (EUs: A06 and B12) in accordance with manufacture's specifications to ensure 100 percent capture for VOCs.
- 5. The Permittee shall apply all spray-applied coatings with HVLP spray guns, electrostatic application, airless spray guns, air-assisted spray guns, or equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which prior written approval has been obtained for the Control Officer. For the purpose of this condition, spray-applied coatings mean

coatings that are applied using a device that creates atomized mist of coating and deposits the coating on a substrate. (Spray applied coatings do not include the following activities: coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters), surface coating application using powder coating, hand-held non-refillable aerosol containers, or non-atomizing technology, including, but not limited to, paint brushes, rollers, hand-wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.)

6. The Permittee shall clean all surface coating application equipment in a manner that does not create an atomized mist of spray gun cleaning solvent and paint residue outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

Vapors

7. The Permittee shall clean all surface coating application equipment in manner that minimizes volatilization of VOC into the ambient air.
8. Except for the open-top dip tanks of EUs: A02 and EU: A03, the Permittee shall ensure all containers with VOC-containing materials securely closed, except during usage and product transfer Containers shall be inspected regularly for leakage, and the contents of any leaking container must be immediately transferred to an appropriately labeled container that has been specifically designed for storage of the compound. Plastic squeeze bottles, wash bottles, spray bottles, dispensing plunger cans, and dispensers with press down caps and/or with narrow tips constitute closed containers as long as the appropriate lid/cap is in place.

VOC Controls

9. The Permittee shall operate with a carbon adsorber (CU: B13) that has at least 92 percent control efficiency based on a minimum inlet of 300 ppmv VOC as propane or no more than 24 ppmv at the outlet to control VOCs from the primer surfacer booth (EU: A04), basecoat booth (EU: A05), and clearcoat booth (EU: A06) at all times VOC containing materials are used in any booth associated with the carbon adsorber.
10. The Permittee shall operate with the RTOs (CUs: B14 and B15) that has at least 98 percent control efficiency based on a minimum inlet of 1000 ppmv VOC as propane or no more than 20 ppmv VOC at the outlet to control VOCs on the body shop oven (EU: B01), e-coat ovens (EUs: B01 and B02), primer surfacer ovens (EUs: B06 and B07), basecoat and, clearcoat ovens (EUs: B11 and B12), and flash off oven (EU: B10) at all times ovens are being operated associated with the RTOs.

Generator/Engine

11. The Permittee shall operate the emergency generator with a turbocharger and aftercooler (EU: D01).
12. The Permittee shall operate and maintain the emergency generator in accordance with the manufacturer's specifications.

Boilers/Water Heaters/Fuel Burning Equipment

13. The Permittee shall combust only natural gas in each boiler and oven.
14. The Permittee shall operate and maintain each of the boilers and ovens in accordance with the manufacturer's specifications.
15. The Permittee shall maintain and operate the natural gas combustion ovens to comply with 0.07 lbs/MMBtu for NO_x in accordance with manufacturer's specifications. (EUs: B01 thru B12, and CU: B13)
16. The Permittee shall maintain and operate the natural gas combustion ASU ovens to comply with 0.098 lbs/MMBtu for NO_x in accordance with manufacturer's specifications. (EUs: B16 thru B22)
17. The Permittee shall maintain and operate the natural combustion ovens for the RTOs to comply with 0.20 lbs/MMBtu for NO_x in accordance with manufacturer's specifications. (CUs: B14 and B15)
18. The Permittee shall maintain and operate the boilers (EUs: C01 and C02) with burners that have a maximum emission concentration of 12 ppm NO_x, corrected to 3 percent oxygen.

Disturbed Surfaces

19. The Permittee shall not cause or allow fugitive dust to become airborne without taking reasonable precautions.
20. The Permittee shall not cause or allow the discharge of fugitive dust in excess of 100 yards from the point of origin or beyond the lot line of the property on which the emissions originate, whichever is less.
21. The Permittee shall treat unpaved roads accessing or located on the stationary source so as not to exceed allowable opacity limits, and neither exceed a silt content of six percent, nor equal or exceed a silt loading 0.33 ounces/square foot, regardless of the number of vehicles. Treatment shall consist of one or more of the following: watering, chemical or organic dust suppression, paving, gravelling, or alternate control measure approved by the Control Officer.
22. The Permittee shall not track out onto a paved road mud or dirt that extends 50.0 feet or more in cumulative length from the point of origin or allow any trackout to accumulate to a depth greater than 0.25 inches. Notwithstanding the preceding, all accumulations of mud or dirt on curbs, gutters, sidewalks or paved roads including trackout less than 50 feet in length and 0.25 inches in depth, shall be cleaned of all observable deposits and maintained to eliminate emissions of fugitive dust.
23. The Permittee shall control fugitive dust emissions from any disturbed open area or disturbed vacant lot that are owned or operated by the Permittee by paving, applying gravel, applying a dust palliative or applying water to form a crust.
24. The Permittee shall implement long-term stabilization of disturbed surfaces when the stationary source, or a portion thereof, is to be closed or idled for a period of 30 days or more, within 10 days following the cessation of active operations. Long-term stabilization includes, but is not limited to one or more of the following: applying water to form a crust, applying palliatives, applying gravel, paving, and denying unauthorized access, or other effective control measure to prevent fugitive dust from becoming airborne.

25. The Permittee shall control particulate matter emissions from any unpaved parking lot owned or operated by the Permittee by paving, applying a dust palliative or by an alternate method approved by the Control Officer regardless of the number of days of use.
26. The Permittee shall effectively cover all loaded trucks leaving the site and carrying loose materials to reduce emissions of dust. This condition applies to trucks regardless of whether they are owned and operated by the owner/operator.

Other

27. The Permittee shall not cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance, including excessive odors. [AQR 40 and AQR 43]

V. PROVISIONAL OPERATING CONDITIONS

A. MONITORING [AQR 12.4.3.1(E)]

Visible Emissions

1. The Permittee shall conduct a monthly visual emissions check for visible emissions from the facility while it is in operation.
2. The Permittee shall conduct a visual emissions check for visible emissions from the emergency generator (EU: D01) while operated for testing and maintenance purposes, but not less frequently than quarterly.
3. If the Permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation.
4. If the Permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the Permittee shall:
 - a. take immediate action to correct causes of fugitive/stack emissions that appear to exceed allowable opacity limits; or
 - b. if practical, have a certified VE observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR 60 Appendix A: Reference Method 9.
5. Visible emissions checks do not require a certified VE observer, except where visible emissions appear to exceed the allowable opacity limit and exceed 30 seconds in duration, and an EPA Method 9 observation is made to establish it does not exceed the standard.

Painting Operations

6. The Permittee shall monitor the minimum volumetric flow rate daily during operations of the source as follows:
 - a. primer surfacer operations: 3531.4 cfm
 - b. basecoat/clearcoat operations: 3531.4 cfm
7. After the permittee has determined these processes have reached their stable state from the daily monitoring, the permittee can request in writing consideration to change

the daily monitoring frequency. Until such request is approved by the Department, the permittee will continue to monitor the minimum average of the volumetric flow rate daily.

8. The Permittee shall inspect the spray booth and all ancillary equipment for filter bypass, malfunctions, and proper operation of gauges, pressure drops, etc., each day the booth is operated.
9. The Permittee shall monitor the consumption of each VOC containing compound (paint strippers, paints, basecoats, primers, reducers, thinners, solvents, etc.) in gallons.
10. The Permittee shall monitor the monthly weighted average mass of VOC emitted per volume of applied coating solids for the e-coat operations (EU: A03) shall be determined using the calculation methodology in 40 CFR Part 60.393(c)(1). Compliance shall be demonstrated by comparing the calculated result with the appropriate limitation above. Each monthly calculation is a performance test for the purpose of this subpart. [40 CFR 60.393(c)(1)(ii)]
11. The Permittee shall monitor the monthly weighted average mass of VOC emitted per volume of applied coating solids for the primer surfacer operations (EU: A04) shall be determined using the calculation methodology in 40 CFR Part 60.393(c)(1). Compliance shall be demonstrated by comparing the calculated result with the appropriate limitation above. Each monthly calculation is a performance test for the purpose of this subpart. [40 CFR 60.393(c)(1)(ii)]
12. The Permittee shall monitor the monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the basecoat, clearcoat, and liquid metal operations (EUs: A05, A06, and A07) shall be determined using the calculation methodology in 40 CFR Part 60.393(c)(1). Compliance shall be demonstrated by comparing the calculated result with the appropriate limitation above. Each monthly calculation is a performance test for the purpose of this subpart. [40 CFR 60.393(c)(1)(ii)]
13. The Permittee shall develop, implement, and submit a work practice plan to the Control Officer for approval to minimize organic HAP emissions from the storage, mixing and conveying of coatings, thinner, and cleaning materials used in, waste materials generated by, all coatings specified in this permit. This plan must specify practices and procedures to ensure that, at a minimum, the elements specified below are implemented in 40 CFR 63.3094(b):
 - a. all organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers;
 - b. the risk of spills of organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be minimized;
 - c. organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes;
 - d. mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP containing coatings and other materials must be closed except when being added to, removing, or mixing the contents; and

- e. emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
14. The Permittee shall develop and implement a work practice to minimize organic HAP emissions from cleaning and from purging of equipment associated with all coating operations in this permit. The plan shall, at minimum, address the following operations in accordance with 40 CFR 63.3094(c):
- a. vehicle body wipe emissions;
 - b. coating line purging emissions;
 - c. flushing of coating systems;
 - d. cleaning of spray booth grates;
 - e. cleaning of spray booth walls;
 - f. cleaning of spray booth equipment;
 - g. cleaning of external spray booth areas; and
 - h. housekeeping measures not addressed in the operations 6 and 7 of this section.

VOC Controls

15. The Permittee shall monitor the carbon adsorber regeneration cycle timing, total regeneration steam flow, bed regeneration temperature, and bed temperature to which bed is cooled after regeneration in accordance with manufacture specifications. The carbon adsorber shall operate at a minimum temperature of 428 °F until an initial performance test is conducted and approved by the Department. This minimum operational temperature shall be recorded every 15 minutes based on a 3 hour rolling average.
16. The Permittee shall monitor the RTO's combustion chamber temperature and exhaust flow rate in accordance with manufacture specifications. The RTO shall operate at a minimum temperature of 1472 °F until an initial performance test is conducted and approved by the Department. This minimum operational temperature shall recorded every 15 minutes based on a 3-hour rolling average.
17. The Permittee shall install, operate, and maintain a continuous parameter monitoring system to monitor the temperature of the carbon adsorber (CU: B13) and the temperature of the RTOs (CUs: B14 and B15). This system shall meet the requirements of 40 CFR Part 63, Subpart IIII 63.3168(a through d).

Generator/Engine

18. The Permittee shall operate the emergency generator (EU: D01) with a nonresettable hour meter and monitor the duration of operation for testing, maintenance and nonemergency operation, and separately for emergencies. The nature of the emergency leading to emergency operation shall be documented.

Boilers/Water Heaters/Fuel Burning Equipment

19. The Permittee shall monitor the monthly fuel consumption for each boilers (EUs: C01 and C02).
20. The Permittee shall inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection can be performed prior to the tune-up or delayed until the next scheduled unit shutdown). [40 CFR Part 63.7540(a)(10)(i)]

21. The Permittee shall inspect and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications. *[40 CFR Part 63.7540(a)(10)(ii)]*
22. The Permittee shall inspect the system controlling the air-to-fuel ratio and ensure that it is correctly calibrated and functioning properly. *[40 CFR Part 63.7540(a)(10)(iii)]*
23. The Permittee shall conduct burner efficiency tests in accordance with the manufacturer's specifications for good combustion practices. Alternative methods may be used after prior approval from the Control Officer (EUs: C01 and C02).
24. The Permittee shall perform a burner efficiency test two times each year. The Permittee shall conduct the tests at least 5 months apart but no more than 7 months apart during each calendar year (EUs: C01 and C02).
25. The Permittee may replace one contemporaneously-required burner efficiency test with a performance test that has acceptable results (EUs: C01 and C02).

B. PERFORMANCE TESTING *[AQR 12.4.3.1(E)]*

1. All performance testing is subject to 40 CFR Part 60.8, 40 CFR Part 63.7, and Air Quality Guideline for Source Testing, (Jan 2013). Performance testing shall be the instrument for determining initial and subsequent compliance with emission limitations set forth in this permit.
2. The Permittee shall conduct an initial performance test in accordance with §60.8(a) and thereafter for each calendar month for each affected facility according to the procedures in this regulation. *[40 CFR Part 60, Subpart MM]*
3. The Permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements of § 63.3151. The initial compliance period begins on the applicable compliance date specified in § 63.3083 and ends on the last day of the month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next month. You must determine the mass average organic HAP content of the materials used each month for each group of materials for which an emission limitation is established in § 63.3090(c) and (d) or § 63.3091(c) and (d). The initial compliance demonstration includes the calculations according to § 63.3151 and supporting documentation showing that during the initial compliance period, the mass average organic HAP content for each group of materials was equal to or less than the applicable emission limits in § 63.3090(c) and (d) or § 63.3091(c) and (d). *[40 CFR Part 63, Subpart IIII]*
4. The Permittee shall perform initial performance testing within 180 days after initial startup of each boiler (EUs: C01 and C02).
5. The Permittee shall perform initial performance testing within 180 days after initial startup for the carbon adsorber (CU: B13) and the RTOs (CUs: B14 and B15) to demonstrate compliance with control efficiency specified in conditions Control Requirements section for VOC Controls. These tests will establish monitoring parameters to be utilized in future permitting actions. *[40 CFR 63.3083(a)(2)]*
6. After the successful completion of the initial performance testing, the Permittee shall conduct subsequent performance testing according to the following conditions:
 - a. Performance tests on each boiler (EUs: C01 and C02) shall be conducted on or before every five-year anniversary date of the previous performance test.

- b. Performance tests on the carbon adsorber (CU: B13) shall be conducted annually, no earlier than 90 days of the previous performance test.
 - c. Performance tests on the RTOs (CUs: B13 and B15) shall be conducted annually, no earlier than 90 days of the previous performance test.
 - d. After completion of three consecutive compliant performance tests for the carbon adsorber (CU: B13 and the RTOs (CUs: B14 and B15), the permittee can request in writing consideration to change the performance testing frequency to every three years or every five years.
 - e. If the permittee has reported deviations outside the volumetric flow rate parameters identified in Section V-A-6, performance testing will be required to be conducted to establish a new volumetric flow rate for that process.
7. The Permittee shall utilize performance testing methodologies for individual emission units as indicated in Table V-B-1. The Control Officer will consider approving a request for alternative performance test methods if proposed in writing in the performance test protocols:

Table V-B-1: Performance Testing Protocol Requirements

Device ID	Test Point	Pollutant	Method	Frequency
EUs: C01 and C02	Boiler Exhaust Outlet Stack	NO _x	Chemiluminescence Analyzer (EPA Method 7E)	5 years
CU: B13	Carbon Adsorber Inlet and outlet	VOC	25A	Annual
CU: B14 and B15	RTO Inlet and outlet	VOC	25A	Annual

8. The Permittee shall submit for approval a performance testing protocol which contains test, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer at least 45 days prior to the anticipated test date but not more than 90 days prior to the anticipated test date.
9. The Permittee shall submit a report describing the results of the performance test to the Control Officer within 60 days from the end of the performance test.
10. The Permittee of any stationary source that fails to demonstrate compliance with the emissions standards or limitations during any performance test, shall submit a compliance plan to the Control Officer within 90 days from the end of the performance test. [AQR 10.1]
11. The Control Officer may require additional performance testing when operating conditions appear to be inadequate to demonstrate compliance with the emissions and/or limitations in this permit. [AQR 4.5]

C. RECORDKEEPING [AQR 12.4.3.1(E)]

1. The Permittee shall maintain the following records onsite:
 - a. dates and time when visible emissions checks and observations are taken and the steps taken to make any necessary corrections to bring opacity into compliance;
 - b. equipment inspections and maintenance;
 - c. control device inspections and monitoring of operating parameters;
 - d. manufacturer specification sheets for the emergency generator (EU: D01);

- e. manufacturer specification sheets for all the boilers and ovens;
 - f. monthly fuel consumption of natural gas consumed by each boiler (EUs: C01 and C02);
 - g. MSDS, SDS or other records demonstrating the VOC and HAP content for each compound;
 - h. daily volumetric flow rate readings;
 - i. monthly spray booth inspections, maintenance and repair;
 - j. work practice plans that minimize the organic HAP emissions;
 - k. work practice procedures for all the combustion units;
 - l. monthly weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for e-coat operations (EU: A03)
 - m. monthly weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for the primer surfacer operations (EU: A04);
 - n. monthly weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for the basecoat, clearcoat, liquid metal operations (EUs: A05, A06, and A07);
 - o. burner efficiency test results; and
 - p. performance test results.
2. The Permittee shall maintain the following records onsite for reporting:
- a. each monthly consecutive 12-month total of cars manufactured;
 - b. each monthly consecutive 12-month total of fuel usage (EUs: C01 and C02);
 - c. each monthly consecutive 12-month total of consumption (in gallons) of each VOC containing compound (paint strippers, paints, basecoats, primers, reducers, thinners, solvents, etc.) and their calculated annual emissions;
 - d. each monthly weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for e-coat operations (EU: A03), if no instances have occurred during a particular quarter; (Semi-annually)
 - e. each monthly weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for the primer surfacer operations (EU: A04), if no instances have occurred during a particular quarter; (Semi-annually)
 - f. each monthly weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for the basecoat, clearcoat, liquid metal operations (EUs: A05, A06, and A07), if no instances have occurred during a particular quarter; (Semi-annually)
 - g. annual VMT for the test track;
 - h. date and duration of operation of emergency generator for testing, maintenance, and nonemergency use (EU: D01);
 - i. date and duration of operation of emergency generator for emergency use, including documentation justifying use during the emergency (EU: D01);

- j. deviations from permit requirements that result in excess emissions (reported as required in Section II-C of this permit);
- k. deviations from permit requirements that do not result in excess emissions; and
- l. calculation of annual emissions for each emission unit and for the entire source.

D. REPORTING [AQR 12.4.3.1(E)]

1. All report submissions shall be addressed to the attention of the Control Officer. [AQR 14.1(b)]
2. All reports shall contain the following: [AQR 12.4.3.1(e)(10)(B)]
 - a. A certification statement on the first page, i.e., “I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete.” (A sample form is available from Air Quality); and
 - b. A certification signature from a responsible official of the company and the date of certification.
3. The Permittee shall submit semi-annual monitoring reports to Air Quality. [AQR 12.4.3.1(e)(10)(B)]
4. The following requirements apply to semi-annual reports: [AQR 12.4.3.1(e)(10)(B)]
 - a. The report shall include a semi-annual summary of each item listed in Section V-C-2(a through l).
 - b. The report shall be based on a calendar semi-annual basis, which includes partial reporting periods.
 - c. The report shall be received by Air Quality within 30 calendar days after the semi-annual period. Regardless of the date of issuance of this ATC, the source shall comply with the schedule for report submissions outlined in Table V-D-1:

Table V-D-1: Required Submission Dates for Various Reports

Required Report	Applicable Period	Due Date
Semi-annual Report for 1 st Six-Month Period	January, February, March, April, May, June	July 30 th each year ¹
Semi-annual Report for 2 nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30 th each year ¹
Annual Emission Inventory Report	Calendar Year	March 31 st each year ¹
Notification of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As Required	Within 24 hours of the Permittee learns of the event
Report of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As Required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As Required	Along with semi-annual reports
Performance Testing	As Required	Within 60 days from the end of the test

¹ If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

5. The Permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*
 - a. The annual emissions inventory must be submitted to Air Quality by March 31st of each calendar year; and
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.
6. The Permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W Russell Road, Suite 200, Las Vegas, Nevada 89118) and the Administrator at EPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each year will be due on or before January 30 of the following year and shall include the following: *[AQR 12.5.2.8(e)]*
7. Replacement of failed engines associated with the emergency generators with identical engines (same manufacturer and model) requires notification prior to installation, but will not require a permit revision unless there is an emission rate increase, or change in the applicable standard from the replacement engines. *[AQR 12.4.3.1(e)(10)(B)]*
8. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. *[AQR 4.4]*
9. The Permittee shall submit a report describing the results of each burner efficiency test to the Control Officer within 30 days from the date the burner efficiency test was conducted.
10. The Permittee shall report deviations that represent no than 3 deviations in a 30-day period outside of the required flow rate parameters identified in Section V-A-6 to Control Officer within 72 hours of the discovery, including a correction action to resolve the exceedance.

MACT Reporting

11. The Permittee shall submit the initial notification no later than 120 days after startup for the coating and painting operations. *[40 CFR Part 63.3110(b)]*
12. The Permittee shall submit the initial notification no later than 15 days after startup for the boilers. *[40 CFR Part 63.7545(c)]*
13. The Permittee shall submit a notification of compliance status no later than 60 days after the first day of the first full month following completion of all applicable performance tests. The notification of compliance status must contain the information specified in paragraphs 63.1110 (c)(1) through (12) for the coating and painting operations. *[40 CFR Part 63.3110(c)]*
14. The Permittee shall submit a notification of compliance status no later than 60 days after the first day of the first full month following completion of all applicable performance tests. The notification of compliance status must contain the information specified in paragraphs 63.7545(e)(1) through (8) for the boilers. *[40 CFR Part 63.7545(e)]*
15. The Permittee shall submit semi-annual compliance reports for each affected source to begin the day after the end of the initial compliance period to end on either June 30th or

December 31st, whichever occurs first following the end of the initial compliance period.
[40 CFR Part 63.3120(a)(1)(i) and 40 CFR Part 63.7550(b)(1)]

- a. The report shall be received by Air Quality after the semi-annual period specified with the schedule for report submissions outlined in Table V-D-2:

Table V-D-2: Required Submission Dates for MACT Reports

Required Report	Applicable Period	Due Date ¹
Semi-annual Report for 1 st Six-Month Period	January, February, March, April, May, June	July 31 th each year ¹
Semi-annual Report for 2 nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 31 th each year ¹

¹ If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

VI. TEMPORARY OPERATING ALTERNATE SCENARIO

A. APPLICABLE OPERATIONAL REQUIREMENTS FOR THIS TEMPORARY OPERATING ALTERNATE SCENARIO

1. Emissions/Stipulations

- a. The operations covered by this TOAS shall be limited to the emissions in Table VI-A-1(a).

Table VI-A-1(a): Emissions (tons per year)

Pollutant	PM ₁₀	PM _{2.5}	NO _x	CO	SO _x	VOC	HAPs	H ₂ S	Pb
Total	8.69	5.21	41.36	56.87	0.43	53.48	8.28	0	0

- b. The Permittee shall limit operations to less than 365 days from initial startup of the TOAS.
- c. The Permittee shall limit the total emissions for any consecutive 12-month period (which includes operation under the provisional operating conditions and the TOAS conditions) to the PTE provided in Table III-A-1.

2. Emission Units

- a. The activities authorized by this TOAS include the emission units listed in Table VI-A-2(a).

Table VI-A-2(a): Summary of Emission Units

EU	Process	Rating (MMBtu/hr)	Type	Manufacturer	Model No.	Serial No.
A01	Body Shop					
A02	Pre-treatment			Eisenmann		
A03	E-Coat			Eisenmann		
A04	Primer Surfacer			Eisenmann		
A07	Liquid Metal			Eisenmann		
A08	Touch up			Eisenmann		
A09	Heavy Repair			Eisenmann		
A10	Final Inspection			Eisenmann		
A11	Sealing			Eisenmann		
A12	Paint Mix Room			Eisenmann		

EU	Process	Rating (MMBtu/hr)	Type	Manufacturer	Model No.	Serial No.					
A13	Sanding			Eisenmann							
A14	Wet Sanding			Eisenmann							
A15	Solvent Use										
A15a	Purge Clearcoat/Gun Cleaning for Liquid Metal Booth in the TOAS										
	Purge Basecoat/Gun Cleaning for Liquid Metal Booth in the TOAS										
A16	Window Assembly										
A17	Battery Adhesive										
A18	Fluids Filling										
A19	Assembly Shop - Primer						Eisenmann				
A20	Assembly Shop - Basecoat						Eisenmann				
A21	Assembly Shop - Clearcoat						Eisenmann				
B01	Body Shop						14.238	Oven	TBD	TBD	TBD
B02	E-Coat						13.589	Oven	Eisenmann	TBD	TBD
B03	E-Coat	13.589	Oven	Eisenmann	TBD	TBD					
B04	Liquid Metal	1.793	Oven	Eisenmann	TBD	TBD					
B05	Liquid Metal	1.793	Oven	Eisenmann	TBD	TBD					
B06	Primer Surfacer	9.506	Oven	Eisenmann	TBD	TBD					
B07	Primer Surfacer	9.506	Oven	Eisenmann	TBD	TBD					
B08	Sanding	9.711	Oven	Eisenmann	TBD	TBD					
B09	Sanding	9.714	Oven	Eisenmann	TBD	TBD					
B16	Work Deck	4.78	Air Supply Unit	Eisenmann	TBD	TBD					
B17	Work Deck	5.429	Air Supply Unit	Eisenmann	TBD	TBD					
B18	Spot Repair	4.436	Air Supply Unit	Eisenmann	TBD	TBD					
B19	Shop	12.291	Air Supply Unit	Eisenmann	TBD	TBD					
B20	Shop	5.053	Air Supply Unit	Eisenmann	TBD	TBD					
B21	Assembly Shop	2.764	Air Supply Unit	Eisenmann	TBD	TBD					
B22	ASU Liquid Metal	5.634	Air Supply Unit	Eisenmann	TBD	TBD					
C01		15.63	Boiler	TBD	TBD	TBD					
C02		15.63	Boiler	TBD	TBD	TBD					
D01		345 kW	Genset – Emergency	Kohler	300REOZJ	TBD					
		463 hp	Engine – Diesel DOM: 2015	John Deere	6090HFG86A	TBD					

- b. The following units or activities are present at this source, but are deemed insignificant units and activities pursuant to AQR Section 12.4 in Table V1-A-2(b).

Table V1-A-2(b): Insignificant Activities

Rating	Description	Product
375,000 VMT/yr	Test Track	
No to exceed 30,000 gallons	Tank	Battery Coolant
Not to exceed 15,000 gallons	Tank	Coolant – Anti-freeze
Not to exceed 15,000 gallons	Tank	Screen - Washer
Not to exceed 15,000 gallons	Tank	Transmission Fluid
Not to exceed 15,000 gallons	Tank	Brake Fluid
Not to exceed 7,000 gallons	Tank	Refrigerant

- c. While operating under the TOAS, the Permittee will not operate the following units listed in Table V1-A-2(c), therefore are not required to comply with the monitoring, performance testing, recordkeeping, and reporting requirements for these units.

Table V1-A-2(c) - Emission Not Operating in the TOAS

Units	Process	Rating (MMBtu/hr)	Type	Manufacturer	Model No.	Serial No.
EU: A05	Basecoat			Eisenmann		
EU: A06	Clearcoat			Eisenmann		
EU: A15a	Purge/Gun Cleaning for the Liquid Metal Booth for the initial booth					
EU: B10	Flash Off	3.585	Oven	Eisenmann	TBD	TBD
EU: B11	Topcoat	8.768	Oven	Eisenmann	TBD	TBD
EU: B12	Topcoat	8.768	Oven	Eisenmann	TBD	TBD
CU: B13	Adsorber	3.414	Burner	Eisenmann	TBD	TBD
CU: B14	RTO	5.122	Burner	TBD	TBD	TBD
CU: B15	RTO	5.122	Burner	TBD	TBD	TBD
CU: E01	Carbon Adsorber			TBD	TBD	TBD
CU: E02	RTO			TBD	TBD	TBD
CU: E03	RTO			TBD	TBD	TBD

3. Emission Limitations and Standards

- a. The Permittee is required to comply with the emission limitations and standards in section IV-A-3 while operating under the TOAS.

4. Operational Limitations

- a. The Permittee shall not exceed 12,000 cars/components.
- b. The Permittee is required to count the number of cars/components towards the production limits set forth in IV-A-4(a).
- c. The Permittee is required to comply with the operational limit in IV-A-4(c) for the emergency generator (EU: D01).

5. Control Requirements
 - a. The Permittee is required comply with the control requirements in section IV-B of this permit while operating under this TOAS.
6. Monitoring
 - a. The Permittee is required to comply with the monitoring requirements in section V-A of this permit while operating under this TOAS.
7. Performance Testing [AQR 12.4.3.1(e)]
 - a. The Permittee is required to comply with the performance testing requirements in section V-B of this permit while operating under this TOAS.

8. Recordkeeping

The Permittee is required to keep records of the following:

- a. dates and time when visible emissions checks and observations are taken and the steps taken to make any necessary corrections to bring opacity into compliance;
- b. total of cars/components manufactured;
- c. total of consumption (in gallons) of each VOC containing compound (paint strippers, paints, basecoats, primers, reducers, thinners, solvents, etc.) and their calculated annual emissions;
- d. equipment inspections and maintenance;
- e. monthly fuel consumption of natural gas consumed by each boiler (EUs: C01 and C02);
- f. daily volumetric flow rate readings;
- g. monthly spray booth inspections, maintenance and repair;
- h. work practice plans that minimize the organic HAP emissions;
- i. work practice procedures for all the combustion units;
- j. weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for e-coat operations (EU: A03);
- k. weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for the primer surfacer operations (EU: A04);
- l. weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids for the liquid metal operations (EUs: A07);
- m. VMT for the test track;
- n. date and duration of operation of emergency generator for testing, maintenance, and nonemergency use (EU: D01);
- o. date and duration of operation of emergency generator for emergency use, including documentation justifying use during the emergency (EU: D01);
- p. deviations from permit requirements that result in excess emissions (reported as required in Section II-C of this permit); and
- q. deviations from permit requirements that do not result in excess emissions.

9. Reporting

- a. The Permittee shall submit reports on a quarterly basis, and a final report 30 days after the conclusion of operating under the TOAS.
- b. The Permittee shall submit initial start-up of normal operations for each process.
- c. The Permittee shall submit quarterly reports for the following:
 - i. source status for anticipated delivery of the ADR and RTOs;
 - ii. anticipated installation of the ADR and RTOs; and
 - iii. summarization of the all the record keeping specified in section 7 during the operations of the TOAS.