



STATEMENT OF BASIS

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BAQ Engineering Services Division
 2600 Bull Street, Columbia, SC 29201
 Phone: 803-898-4123 Fax: 803-898-4079

Company Name: BMW Manufacturing Co., LLC
Permit Number: TV-2060-0230

Permit Writer: Susan Peterson
Date: June 11, 2009

DATE APPLICATION RECEIVED: August 9, 2006 (original TV renewal application)
 October 4, 2007 (Paint Shop expansion; revised TV forms included)
 February 9, 2009 (Energy Center expansion; revised TV forms included)
 May 7, 2009 (Complete TV renewal application, for PN purposes)
 June 8, 2009 (Revised CAM plan, to insert in TV renewal application)

DATE OF LAST INSPECTION: September 4, 2008

FACILITY DESCRIPTION This facility is an automobile manufacturing plant. The facility is currently manufacturing the X5 SAV and the X6 Crossover SAV. The facility is currently undergoing an expansion. BMW operates under a Plant Wide Applicability Limit (PAL) Permit.

FACILITY CONTACTS: Briggs Hamilton, P.E., BMW (864) 989-5772, briggs.hamilton@bmwmc.com
 Kyle Yonce, BMW (864) 989-5986 kyle.yonce@bmwmcext.com
 Allison Hoft, ENSR (803) 216-0003 allison.hoft@aecom.com

PROJECT DESCRIPTION Renew TV permit.

CHANGES SINCE LAST OP ISSUANCE TV permit was last revised on June 9, 2006. The facility has undergone an expansion of the Paint Shop (Minor Modification application received October 2007) and is currently undergoing an expansion of the Energy Center (Minor Modification application received February 2009) and activities described in the (Assembly North April 2009 submittal).

Permitting submitted a request for revised air modeling on February 23, 2009 to reflect the Energy Center expansion (removal of Turbines GT01 and GT02; installation of Turbines GT05, GT06).

SPECIAL CONDITIONS, MONITORING, LIMITS BMW operates under a Plant Wide Applicability Limit (PAL) Permit.

PUBLIC NOTICE The renewal of the TV permit will undergo a 30-day public notice period and 45 day EPA review period.

SOURCE DESCRIPTION

Emission Unit ID	Emission Unit Description	Control Device
01	Energy Center - Cogeneration Turbines	Selective Catalytic Reduction
02*	Energy Center Expansion - Cogeneration Turbines and Siloxane Treatment Process	Dry Low NO _x burners and Flare
03	Energy Center - Auxiliary Boilers	Flue Gas Recirculation (FGR) with low-NO _x burners or equivalent
04*	Energy Center Expansion - Auxiliary Boilers	FGR with low-NO _x burners or equivalent
05	Paint Shop Combustion Sources	Low NO _x burners
06*	Paint Shop Expansion Combustion Sources	Low NO _x burners
07	Paint Shop Primecoat (E-coat) Operations	Regenerative Thermal Oxidation (RTO)
08*	Paint Shop Expansion Primecoat (E-coat) Operations	RTO
09	Paint Shop Guidecoat Operations	RTO, Water Curtain, Dry Filtration
10*	Paint Shop Expansion Guidecoat Operations	RTO, Water Curtain, Dry Filtration
11	Paint Shop Topcoat Operations	RTO, Water Curtain, Dry Filtration, Rotary Carbon Adsorption
12*	Paint Shop Expansion Topcoat Operations	RTO, Water Curtain, Dry Filtration, Rotary Carbon Adsorption
13	Paint Shop Purge Solvent Operations	N/A
14*	Paint Shop Expansion Purge Solvent Operations	N/A
15	Multi-Function Testing / Cosmoline Application	Water Curtain
16*	Expansion Multi-Function Testing / Cosmoline Application	Water Curtain



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Emission Unit ID	Emission Unit Description	Control Device
17	Transpack Operations	N/A
18	ICP Dewax Unit	Hohmeier
19*	Plastic Parts Combustion Sources	Low NO _x Burners
20*	Plastic Parts Guidecoat Operations	RTO, Water Curtain
21*	Plastic Parts Topcoat Operations	RTO, Water Curtain, Dry Filtration, Rotary Carbon Adsorption
22*	Plastic Parts Paint Shop Purge Solvent Operations	N/A
23	Body Shop Welding Areas	ESP or Dry Filtration
24*	Body Shop Expansion Welding Areas	ESP or Dry Filtration
25	Logistics Center 2	N/A
26	Assembly Operations	Stage II Vapor Recovery
27	Tank Farm	Stage I Vapor Return System

*These units have been permitted under 2060-0230-CY but have not yet been installed.

EMISSIONS

ID	Pollutant	UNCONTROLLED EMISSIONS		CONTROLLED EMISSIONS	
		lb/hr	TPY	lb/hr	TPY
01	PM/PM ₁₀	1.63	7.15	N/A	N/A
	SO ₂	1.09	4.76	N/A	N/A
	NO _x	14.13	61.89	N/A	N/A
	CO	48.28	211.47	N/A	N/A
	VOC	0.60	2.61	N/A	N/A
	HAP	0.07653	0.34	N/A	N/A
02	PM/PM ₁₀	7.08	31.01	N/A	N/A
	SO ₂	4.93	20.62	N/A	N/A
	NO _x	28.24	122.68	N/A	N/A
	CO	210.08	916.75	N/A	N/A
	VOC	2.59	11.33	N/A	N/A
	HAP	0.3311	1.45	N/A	N/A
03	PM/PM ₁₀	1.57	6.89	N/A	N/A
	SO ₂	2.80	12.26	N/A	N/A
	NO _x	17.60	77.07	N/A	N/A
	CO	109.80	480.92	N/A	N/A
	VOC	1.54	6.73	N/A	N/A
	HAP	0.3678	1.61	N/A	N/A
04	PM/PM ₁₀	2.63	11.53	N/A	N/A
	SO ₂	4.68	20.51	N/A	N/A
	NO _x	29.42	128.87	N/A	N/A
	CO	183.60	804.17	N/A	N/A
	VOC	2.57	11.26	N/A	N/A
	HAP	0.5781	2.53	N/A	N/A
05	PM/PM ₁₀	1.43	6.27	N/A	N/A
	SO ₂	0.84	3.69	N/A	N/A
	NO _x	9.35	40.94	N/A	N/A
	CO	15.16	66.41	N/A	N/A
	VOC	1.15	5.02	N/A	N/A
	HAP	0.3497	1.53	N/A	N/A
06	PM/PM ₁₀	3.39	14.83	N/A	N/A



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ID	Pollutant	UNCONTROLLED EMISSIONS		CONTROLLED EMISSIONS	
		lb/hr	TPY	lb/hr	TPY
	SO ₂	0.27	1.17	N/A	N/A
	NO _x	22.28	97.59	N/A	N/A
	CO	37.43	163.95	N/A	N/A
	VOC	2.45	10.74	N/A	N/A
	HAP	0.8455	3.70	N/A	N/A
07	VOC	15.94	45.90	3.67	10.58
08	VOC	35.24	101.48	4.81	13.85
09	PM/PM ₁₀	273.25	786.96	5.69	16.38
	VOC	62.87	181.06	44.85	129.17
10	PM/PM ₁₀	262.95	757.29	5.62	16.17
	VOC	70.95	204.33	27.49	79.17
11	PM/PM ₁₀	90.39	260.32	1.93	5.57
	VOC	92.74	267.10	60.97	175.60
(07, 09, 11)	HAPs	130.00	374.39	83.06	239.22
12	PM/PM ₁₀	60.29	173.62	1.41	4.07
	VOC	171.57	494.13	66.58	191.74
(08, 10, 12)	HAPs	79.62	229.31	8.51	79.62
13	VOC	15.49	44.60	N/A	N/A
14	VOC	24.78	71.36	N/A	N/A
15	PM/PM ₁₀	8.71	25.09	0.17	0.50
	NO _x	0.21	0.62	N/A	N/A
	CO	2.36	6.78	N/A	N/A
	VOC	0.22	0.64	N/A	N/A
	HAP	0.01	0.03	N/A	N/A
16	PM/PM ₁₀	12.18	35.08	0.24	0.70
	NO _x	0.22	0.63	N/A	N/A
	CO	1.15	3.31	N/A	N/A
	VOC	0.26	0.75	N/A	N/A
	HAP	0.01	0.01	N/A	N/A
17	PM/PM ₁₀	0.04	0.11	N/A	N/A
	SO ₂	0.003	0.009	N/A	N/A
	NO _x	0.50	1.43	N/A	N/A
	CO	0.42	1.20	N/A	N/A
	VOC	3.33	9.59	N/A	N/A
	HAP	0.43	1.24	N/A	N/A
18	PM/PM ₁₀	0.07	0.21	N/A	N/A
	SO ₂	0.11	0.32	N/A	N/A
	NO _x	0.62	1.79	N/A	N/A
	CO	0.61	1.76	N/A	N/A
	VOC	52.54	151.31	1.98	5.70
19	PM/PM ₁₀	0.26	1.13	N/A	N/A
	SO ₂	0.02	0.09	N/A	N/A
	NO _x	1.70	7.44	N/A	N/A
	CO	2.85	12.50	N/A	N/A
	VOC	0.19	0.82	N/A	N/A
	HAP	0.0633	0.28	N/A	N/A
20	PM/PM ₁₀	16.11	46.40	0.32	0.93
	VOC	5.35	15.41	3.83	11.02
21	PM/PM ₁₀	45.34	130.57	1.10	3.17



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ID	Pollutant	UNCONTROLLED EMISSIONS		CONTROLLED EMISSIONS	
		lb/hr	TPY	lb/hr	TPY
	VOC	52.96	152.54	25.60	73.74
(20, 21)	HAP	20.08	57.83	10.13	29.19
22	VOC	8.29	23.88	8.29	23.88
23	PM/PM ₁₀	1.32	3.80	0.07	0.19
	VOC	0.58	1.66	0.58	1.66
24	PM/PM ₁₀	2.11	6.09	0.11	0.30
	VOC	0.92	2.66	0.92	2.66
25	PM/PM ₁₀	0.01	0.06	0.01	0.06
	SO ₂	0.001	0.004	0.001	0.004
	NO _x	0.17	0.75	0.17	0.75
	CO	0.14	0.63	0.14	0.63
	VOC	0.01	0.04	0.01	0.04
	HAP	0.0013	0.01	N/A	N/A
26	PM/PM ₁₀	0.00007	0.0003	0.00007	0.0003
	SO ₂	0.00001	0.00002	0.000005	0.00002
	NO _x	0.0009	0.004	0.0009	0.004
	CO	0.0007	0.003	0.0007	0.003
	VOC	8.60	24.75	3.68	10.60
	HAP	0.0000	0.00	N/A	N/A
27	VOC	2.54	11.14	0.93	4.07

Method of estimating emissions: AP-42 emission factors, Source test results, mass balance.

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
PM/PM ₁₀	2,418	140
SO ₂	66	N/A
NO _x	602	470
CO	2,724	1,761
VOC	1,981	993
HAP	675	306

Note: The Facility-wide emissions are listed on Form F of the May 7, 2009 revised TV application.

Production Level	Facility-wide limit (TPY)				
	VOC	SO ₂	NO _x	CO	PM-PM ₁₀
< 180,000 units	340	17	124	500	41
< 180,000 units and plastic parts shop	469	17	131	513	46
> 180,000 units	--	20	356	1042	96
> 180,000 units and the plastic parts shop	--	20	363	1054	102
Between 180,000 and 324,000 units	604	--	--	--	--
Between 180,000 and 324,000 units and plastic parts shop	733	--	--	--	--
> 324,000 units	855	--	--	--	--
> 324,000 units and the plastic parts shop	984	--	--	--	--



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PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments
	Yes	No	
South Carolina Regulation 61-62.1 through 62.99: Air Pollution Regulations (PROJECT ONLY)			
Section II(E): Synthetic Minor		X	This is a renewal of a TV permit
Section II(G): Conditional Major		X	BMW does not qualify to operate as a conditional major source.
Standard 1: Fuel Burning Operations	X		<ul style="list-style-type: none"> (IDs 03, 04, 05, and 06 [certain equipment for 05, 06]) 20% Opacity limit. Testing is Not Required. (IDs 01, 02) BMW shall conduct an annual visual inspection for Opacity since those units may burn diesel fuel in addition to natural gas of LFG. (IDs 01, 02, 03, 04, 05, and 06 [certain equipment for 05, 06]) BMW must maintain fuel consumption records to determine monthly emissions of criteria pollutants due to fuel combustion. (IDs 03, 04, 05, and 06 [certain equipment for 05, 06]) The owner/operator shall maintain a log of the time, magnitude, duration and any other pertinent information to determine periods of startup and shutdown (regarding Opacity). No record keeping or continuous monitoring of Opacity is required since BMW is burning natural gas or LFG (no opacity expected).
Standard 2: Ambient Air Quality Standards	X		This facility has demonstrated compliance through modeling; see modeling summary dated May 19, 2009. No operational restriction has been established to ensure compliance with the modeled emission rates.
Standard 3: Waste Combustion/Reduction (state only)	X		<p>Opacity</p> <ul style="list-style-type: none"> The RTOs (Unit IDs 07, 08, 09, 10, 11, 12, 20, 21) are subject to a 20% Opacity limit in accordance with SC Regulation 61-62.5, Standard No. 3 – Waste Combustion and Reduction. No monitoring/reporting/record keeping is required since the RTOs are permitted to burn only natural gas or LFG. <p>Waste Analysis</p> <ul style="list-style-type: none"> The RTOs (Unit IDs 07, 08, 09, 10, 11, 12, 20, 21) are subject to SC Regulation 61-62.5, Standard No. 3, Section V – Waste Analysis. No testing is required. The source testing has waived in accordance with SC Regulation 61-62.5, Standard No. 3, Section VIII (A). The material safety data sheets for the paints and solvents used have been approved as an alternative method for determining compliance with this regulation. <p>Waste Combustion and Analysis (of various pollutants)</p> <ul style="list-style-type: none"> The Hohmeier unit (Unit 18, Equipment ID CD-H1) burns recovered kerosene and conservation wax and is



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Regulation	Applicable		Comments
	Yes	No	
			thus subject to SC Regulation 61-62.5, Standard No. 3, Waste Combustion and Reduction. <ul style="list-style-type: none"> No testing is required since BMW has already fulfilled the testing requirements. They conducted a waste analysis for the waste streams (which includes any stream that is not a commercial virgin fuel) to be burned in these units.
Standard 3.1: HMI Waste Incinerators		X	No medical waste.
Standard 4: Emissions from Process Industries	X		<p>Opacity</p> <ul style="list-style-type: none"> 20% for Unit IDs 01, 02, 05*, 06*, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27 <p>* (only certain equipment in 05, 06)</p> <p>Testing</p> <ul style="list-style-type: none"> Not required since the units burn only natural gas or LFG as fuel <p>Monitoring</p> <ul style="list-style-type: none"> Because Unit IDs 01 and 02 can burn diesel fuel, BMW is required to conduct annual visual inspections for opacity limits; maintain readings in logs. No monitoring/recordkeeping/reporting is required for units that are permitted to burn only natural gas or landfill gas as fuel. No monitoring/recordkeeping/reporting is required for the equipment in Unit IDs 07, 08 since those sources do not emit PM. There are units that don't combust fuel and don't have Opacity monitoring conditions. That is due to the nature of their processes; there is no PM expected as part of that operation.
Standard 5: Volatile Organic Compounds		X	The facility was not in existence in 1979 or 1980.
Standard 5.1: BACT/LAER For VOC (state only)	X		Unit IDs 09, 10, 11, 12, 20, 21
Standard 5.2: Control of Oxides of Nitrogen	X		When BMW replaces burners, it replaces them with burners that meet the low NO _x criteria specified in Standard 5.2.
Standard 7: Prevention of Significant Deterioration	X		<p>Combined capture and control efficiencies</p> <ul style="list-style-type: none"> 76% for Unit IDs 07, 08 E-coat operations. 9.5% for Unit IDs 09, 10 guidecoat operations. 9.5% for Unit IDs 11, 12 topcoat operations <p>Capture efficiency source test</p> <ul style="list-style-type: none"> BMW has completed the Initial capture efficiency source test for RTO2 (installed 2/2008). RTO2 controls VOC emissions from Unit IDs 07, 08, 09, 10, 11, 20, 21. BMW must complete an Initial capture efficiency test for RTO1 (has been relocated; currently being assembled in a new location). RTO1 controls VOC emissions from Unit IDs 10, 12



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	Yes	No	
			<p><u>Annual capture efficiency source tests</u></p> <ul style="list-style-type: none"> • BMW must conduct annual testing provided that there are no physical changes to the capture system • This annual testing can be waived under certain provisions. • This applies to both RTO1 and RTO2
Standard 7(c): Ambient Air Increments	X		The most recent modeling summary, dated May 19, 2009, is for Standard 2 only. BMW and DHEC have worked out a schedule to submit modeling revisions and revise the modeling summary as BMW is in the process of its Expansion projects. The prior modeling summary, dated November 5, 2007, shows BMW to be in compliance with Standard 7.
Standard 7.1: Standards for Non Attainment Areas		X	The EPA designated Spartanburg County as being in "Attainment" on April 1, 2008.
Standard 8: Toxic Air Pollutants (state only)	X		The most recent modeling summary, dated May 19, 2009, is for Standard 2 only. BMW and DHEC have worked out a schedule to submit modeling revisions and revise the modeling summary as BMW is in the process of its Expansion projects. Once all phases are completed, a Standard 8 update based on MACT regulations and applicable sources will be performed. After that, a Class I and Class II analysis will be submitted. The prior modeling summary, dated November 5, 2007, shows BMW to be in compliance with Standard 8.
Regulation 61-62.6: Control of Fugitive Particulate Matter		X	This facility does not have fugitive PM (Dust) emissions.
Regulation 61-62.60: SC Designated Facility Plan and NSPS		X	<p>NSPS Subpart GG (Unit ID 01)</p> <ul style="list-style-type: none"> • NO_x emission limits • SO₂ emission limits met through fuel sulfur restrictions • Testing not required. BMW has already conducted a Performance Test on Turbines GT03, GT04 to show compliance with NO_x and SO₂ limits. <p>NSPS Subpart KKKK (Unit ID 02)</p> <ul style="list-style-type: none"> • NO_x and SO₂ emission limits • Testing for NO_x compliance: BMW is required to conduct both an Initial and an Annual Test on GT05, GT06, GT07, and GT08 to show compliance with NO_x limits. There is an alternative to the annual testing. • Testing for SO₂ compliance: BMW is required to conduct an Initial Performance Test on GT05, GT06, GT07, and GT08 to show compliance with SO₂ limits. There is an alternative to the initial testing. <p>NSPS Subpart Dc (Unit IDs 03, 04)</p> <ul style="list-style-type: none"> • Fuel combustion record keeping for Unit IDs, 03, 04 • Written Notification for Unit ID 04 (future unit) • There are only SO₂ and PM requirements for Dc. If the



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PROJECT REGULATORY APPLICABILITY REVIEW

Regulation	Applicable		Comments
	Yes	No	
			boilers burned oil, then there would be an Opacity limit. NSPS Subpart MM (Unit IDs 07, 08, 09, 10, 11, 12) <ul style="list-style-type: none"> The VOC requirements are listed as specified in the NSPS BMW shall conduct an initial performance test on the RTOs, and shall conduct a subsequent performance test every 4 years. BMW has conducted the initial performance test on RTO2, installed 2/2008. RTO2 controls and/or will control VOCs from Unit IDs 07, 08, 09, 10, 11, 20, 21). BMW is required to conduct an initial performance test on RTO1. RTO1 was relocated in 2009, and is currently being reassembled in its present location. RTO1 controls VOCs from Unit IDs 10, 12.
Regulation 61-62.61: NESHAP		X	This process does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
Regulation 61-62.63: NESHAP For Source Categories		X	This facility does not have any sources subject to an area-source MACT.
Regulation 61-62.68: Chemical Accident Prevention		X	This construction project does not store or use chemicals subject to 112(r) above the threshold quantities.
Regulation 61-62.70: Title V	X		The facility meets the definition of a source that would require a Title V permit. This SOB is for the renewal of an existing TV permit.
Regulation 61-62.72: Acid Rain		X	The facility is not a utility unit.
Regulation 61-62.96: Nitrogen Oxides (NO _x) Budget Trading Program		X	The facility does not participate in NO _x emissions trading.
Regulation 61-62.99: Nitrogen Oxides (NO _x) Budget Program Requirements for Stationary Sources Not In the Trading Program		X	This Regulation only applies to kilns.
Other (Fuel Type)	X		Fuel Type <ul style="list-style-type: none"> Each turbine (Unit IDs 01, 02) is permitted to burn only diesel fuel, natural gas, or LFG as fuel. Testing is not required. BMW is required to record on a monthly basis all fuel consumption at the facility including all virgin and non-virgin fuels (Unit IDs 01, 02). Semi-annual reports required.
Other (Operational Flexibility)	X		The Permit contains Condition 6.A.1 that states: For Unit ID 26, Assembly Operations, BMW is permitted to fuel vehicles equipped with onboard refueling vapor recovery (ORVR) in lieu of Stage II Vapor Return System (CD-AB02). BMW shall maintain records of fueling for the vehicles using ORVR.
Federal Regulations (PROJECT ONLY)			
NSPS (Part 60) Subpart(s)	X		NSPS Subpart GG (Unit ID 01) NSPS Subpart KKKK (Unit ID 02) NSPS Subpart Dc (Unit IDs 03, 04)



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NESHAP (Part 61) Subpart(s)		X	NSPS Subpart MM (Unit IDs 07, 08, 09, 10, 11, 12) This process does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
MACT (Part 63) Subpart(s)	X		MACT IIII: (Unit IDs 07, 08, 09, 10, 11, 12) MACT MMMM: (Unit IDs 07, 08, 09, 10, 11, 12) MACT PPPP: (Unit IDs 07, 08, 09, 10, 11, 12) MACT YYYY: (Unit ID 02) MACT DDDDD: (Unit IDs 03, 04, 05, 06, 19) <ul style="list-style-type: none"> • RTO1 and RTO2 are considered MACT-control devices. They control VOCs. MACT Subpart IIII requires BMW to limit HAP emissions used in coating operations to no more than 0.072 kg/liter of coatings solids during each month, in accordance with §63.3161. • None of the Dry Filters or Wash water baffles are considered MACT-control devices since they do not control HAPs. • DLN (Dry Low NO_x burners) are not considered MACT-control devices. The MACT requirements for the turbines in Unit ID 02 are Initial Notification, fuel usage recordkeeping, and annual reporting. • The TV permit will list LNB (Low NO_x burners) as non-MACT control devices since this MACT has been vacated.
Area Source Standards (Part 63) Subpart(s)		X	This facility does not have any sources subject to an area-source MACT.
Compliance Assurance Monitoring (CAM) (Part 64)			Unit IDs 09 (RTO2) and 10 (RTO1, RTO2) In order to meet the NSPS Subpart MM limit of 11.67 lb/gal of applied coatings solids, RTO1 and RTO2 are subject to CAM requirements. The condition (ID 09) has been written based on the 7/16/2008 performance test that lists the average temperature of the RTO firebox as 1551 °F. From this temperature, Excursion levels have been determined. Although given the option to use the Average temperature reading of RTO2, BMW has opted to conduct a source test of RTO1 due to it having a different manufacturer and assumed greater efficiency due to its age. An appropriate CAM condition (ID 10) has been written for that scenario. Unit IDs 11 (RTO2, KCR01) and 12 (RTO1, KCR02) In order to meet the NSPS Subpart MM limit of 11.67 lb/gal of applied coating solids, RTO1, RTO2, KCR01, and KCR02 are subject to CAM requirements. The conditions are written based on whether the performance test results (and subsequently the Excursion data points) are known.
Other		X	NSPS Subpart JJJJ (Stationary Spark Ignition Internal Combustion Engines) has not yet been promulgated. This standard was proposed in the Federal Registry on June 12,



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Regulation	Applicable		Comments
	Yes	No	
			2006. When promulgated, it will affect all new engines and those modified or reconstructed after June 6, 2006.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

draft