Company Name: **Agency Air Number:** **Permit Number:**	Scout Motors Inc A Delaware Corporation - Blythewood Plant 1900-0350 PSD-50000007 v1.0	**Permit Writer:** **Date:**	Amanda N. Cruley October 31, 2023

DATE APPLICATION RECEIVED: June 01, 2023

PROJECT DESCRIPTION
Issuance of a PSD construction permit for the construction of a new automobile stamping and assembly plant. Although multiple buildings and pieces of equipment are described as phase 1 or phase 2, the facility has not requested and will not be issued a phased construction permit.

FACILITY DESCRIPTION
SIC CODE: 3711
NAICS CODE: 336110

This facility will consist of two areas – an automobile stamping plant and an automotive assembly plant along with several, smaller support operations.

Automobile Stamping Plant

In the stamping plant, cranes move aluminum coils onto a blanking press. The blanking press then presses, flattens, straightens, and cuts the aluminum into the basic shape, called a "blank", to be used for other parts. Small quantities of a blank wash compound are applied to the sheet metal prior to stamping to lubricate the steel and provide a smooth finish. Blank are fed into the press line and are shaped and trimmed to form the finished sheet metal part. The presses use a series of dies or steel molds to form the desired shape. These dies are placed in hydraulic stamping machines where the metal parts are produced under significant force. The stamped parts are washed with a detergent and then inspected before placing them on racks. The parts are temporarily stored until needed in the body shop. The blank wash and detergent materials contain no volatile organic compounds. Therefore, no emissions are expected from these materials.

Automotive Assembly Plant

The automobile assembly facility will operate a body shop, a paint shop, and an assembly shop as part of the automobile assembly operation. The following sections provide details on the operations at the proposed facility.

Body Shop

In the body shop, parts are assembled to form the "body-in-white", including stamped parts, the front-end subassembly, the rear-end subassembly, the side frame subassembly, the underbody subassembly, the mid and upper-body assembly, and panels. Parts are joined using welds, solder, adhesives, and rivets. At the end of the body shop process, the "body-in-white" is lifted onto a conveyor and sent to the paint shop. No PM emissions are expected for spot welding, since spot welding involves no consumable welding material. PM emissions are expected from welding and soldering. In addition, CO_2 shield gas is used in the welding operations, which results in emissions of CO_2. It is assumed that 95% of VOC from adhesive use is controlled through the E-coat oven abatement.

Paint Shop

The paint shop will be designed as a full, high volume operation to meet Scout requirements, The maximum production rate will be 45 vehicles per hour (45 jobs per hour or 45 JPH) during the first phase of the project and an additional 45 JPH during the second phase of the project, for a throughput capacity of 90 JPH. The facility will be designed to operate up to three shifts per day with a potential production level of 470,000 vehicles annually. The paint shop will receive vehicle bodies from the body shop and will deliver coated bodies to the assembly shop. The paint shop will include the operations described in the following subsections.

Degreasing and Pretreatment

As the first step in the coating process, all vehicle body surfaces must be cleaned and treated in degreasing and pretreatment operation to maximize paint adhesion. Vehicle bodies are cleaned with alkaline cleaners followed by water rinses. The vehicle bodies are then pre-treated in a tri-cation phosphate solution followed by additional water rinses. The pretreatment solution prepares the metal (aluminum and steel) surfaces for the subsequent coating operations. The pretreatment tanks are exhausted to vent water vapor. There is no quantifiable basis for estimating emissions and no VOCs are expected to be emitted from the pretreatment operations.

E-Coat Tank and Oven

The first coating applied to the vehicle bodies is electrocoat primer (E-coat). Vehicle bodies are dipped into one (1) of two (2) E-coat dip tanks of the water-borne E-coat made up of mixed pigment and resin components. While the bodies are in the tank, an electrical charge is applied that assists in the adhesion of paint solids onto all portions of the vehicle body (interior and exterior surfaces). Following the coating application, the vehicle bodies are rinsed with water to remove and recover any excess or additional coating solids. The vehicle bodies are then directed to an electric E-coat oven. The vehicle bodies are cured in the oven to prepare for the next coating application. Each E-coat process line will have two (2) electric E-coat ovens with a capacity of 225 JPH. Emissions from the E-coat dip tanks are uncontrolled, while emissions from the E-coat ovens are directed to electric RTOs. A destruction efficiency of 95% has been assumed for the E-coat oven emissions.

PVC Deck

A polyvinyl chloride (PVC) anti-chip material is applied to the vehicle lower body to prevent paint chipping due to stones or other objects hitting the vehicle. The PVC material is a low-VOC, high-solids material that is robotically applied to the vehicle body and air dried. It is assumed that 30% of the VOC in the PVC material is emitted from the PVC deck. Following PVC application, the vehicle bodies pass through the sealer ovens. It is assumed that 70% of the VOC in the PVC material is emitted within the sealer ovens. The sealer oven emissions are controlled by an RTO with a 95% destruction efficiency.

Paint Sealer and Deadener Deck and Oven

The paint sealer and deadener application deck consist of several sealer application stations where various high-solids, low-VOC sealers and liquid sound deadeners are applied via manual or robotic applications. All applications are pumped directly onto the vehicle bodies (flow coating) to seal seams in the vehicle body to eliminate water or air leaks into the vehicle body. To prepare the sealer prior to topcoat application, the vehicle bodies are directed

to electric sealer ovens to gel the sealers. For the purposes of emission calculations, it is assumed that 30% of the VOC emissions are released from the sealer deck uncontrolled, while the remaining 70% of the VOC in the sealer is emitted within the sealer ovens.

Topcoat Preparation (Workdeck)

After the sealer ovens, the vehicle bodies pass to a topcoat preparation area where the vehicle surface is cleaned using emu feathers and sword brushes. Emissions from the topcoat preparation area are minimal and are estimated based on an outlet grain loading rate and airflow from the topcoat preparation area.

Topcoat Operations

Following the E-coat, sealer, and PVC operations, the vehicle bodies are directed to basecoat booths (two booths at 22.5 JPH for each line, for a total of four booths) where basecoat is applied to the vehicle body. This process unique within the industry, as no primer (guidecoat) is applied to the vehicles prior to the application of basecoat. Following the basecoat booths, the vehicles are dried in a heated flash-off zone, and then move into clearcoat booths (two booths at 22.5 JPH for each line, for a total of four booths). The materials applied to the vehicle body will be high-solids, solvent-based coatings which allow for the painting application in smaller booths. The topcoat (basecoat and clearcoat) booths will apply two (2) basecoats and one (1) clearcoat to all exterior portions of the vehicle body as well as the door, decklid, and hood openings. All paint application will be performed by robotic and bell applicators. The air passing through each of the automated paint spray application zones will pass through a dry filtration system (inherent) and will then be recirculated through the zones to minimize the need to condition air (heating/cooling) before entering the booth. At all times during production, the air passing through the active spray zones will be recirculated and a portion of the air will be directed to abatement equipment (the concentrators and RTOs). The make-up air to replace the air directed to control will be cascaded from the air supplied to the back-up zones where available. Therefore, the air passing through all flash and back-up zones where no painting occurs is also directed to the abatement equipment. As a result, all of the VOC emissions emitted from the active spray zones as well as the VOC emitted from vehicle bodies as they pass through the flash or back-up zones will be directed to the abatement equipment. During maintenance periods, the topcoat booths are cleaned with equipment cleaners and VOC emissions vent to atmosphere through bypass stacks. Emissions from the cleaning process are uncontrolled. Although 100% of the booth exhaust will be directed to abatement equipment during production, the booth does not meet the definition of Permanent Total Enclosure as the facial velocity at the entrance and exit of the system is less than 200 feet per minute, As such, Scout has assumed a small percentage of emissions would not be directed to the abatement equipment in its emission calculations even though all of the exhaust air and ducts are directed to the abatement equipment. Each painting robot station will be equipped with a purge pot collection system to capture and recover paint and solvents from the application equipment during color changes and applicator cleaning operations, The vehicle bodies will then be directed to the electric topcoat ovens (two ovens for each topcoat line, for a total of four ovens) where the applied coatings will be cured. All exhaust air from the ovens will be directed to the RTOs.

Finesse, Rework and Heavy Repair (Workdecks)

After the topcoat ovens, the vehicle bodies move to inspection areas and then finesse decks where any imperfections in the cured topcoat are lightly sanded. Further rework is completed in the designated rework line. Larger repairs are completed in a heavy repair work deck. Emissions from the sanding, rework and heavy repair operations are minimal and are estimated based on an outlet grain loading rate and airflow from these areas.

Tutone Operations

In addition to the above-described operations, a number of vehicles will receive additional coatings in the Tutone booths. Following E-coat, PVC, sealer, and topcoat operations, those vehicles slated for Tutone will receive a basecoat and Tutone application on limited portions of the vehicle, cure in a heated basecoat flash off zone, and receive a clearcoat application on limited portions of the vehicle. The Tutone process uses applicators that directly apply the coating to the vehicles without atomization or spray, resulting in nearly 100% transfer efficiency. This technology can only be used for the larger surfaces that require the Tutone coating. The air passing through each of the Tutone application zones will pass through a dry filtration system and will then be recirculated through the zones to minimize the need to condition air (heating/cooling) before entering the booth. At all times during production, air passing through the Tutone active spray zones will be recirculated and a portion will be directed to abatement equipment (the concentrators and RTOs), The make-up air to replace the air directed to control will be cascaded from the air supplied to the back-up zones where available. Therefore, the air passing through the flash tunnels and back-up zones where no painting occurs is also directed to the abatement equipment. As a result, all of the VOC emissions emitted from the Tutone application zones as well as the VOC emitted from vehicle bodies as they pass through all flash tunnels and back-up zones will be directed to the abatement equipment. During maintenance periods, the Tutone booth is cleaned with equipment cleaners and VOC emissions vent to atmosphere through bypass stacks. Emissions from the cleaning process are uncontrolled. The vehicle bodies will then be directed to the Tutone oven where the applied coatings will be cured. AII of the exhaust air from the Tutone oven will be directed to the RTOs.

Purge Solvent

Purge solvent is used to remove coating material from application equipment. A purge solvent collection system is required to collect purge solvent from the application areas. The system then pumps the recovered solvent to the paint mix room for reuse or shipment off-site.

Spot Repair

If a body panel or spot requires painting prior to existing the paint shop, the vehicle is sent to spot repair. In the spot repair process, primer, basecoat, and clearcoat are manually applied, and the coatings are cured with portable lamps within the booth. The air supply units provide filtered make-up air for the spot repair booths. Exhaust air is filtered using dry overspray filters and is vented to the atmosphere.

Cavity Wax

After inspection and any necessary repairs, vehicle bodies are transferred to booths where cavity wax is applied to inner recesses of the vehicle bodies. Process exhaust from all cavity wax application areas will be vented to

atmosphere. It is assumed that all cavity wax is either transferred to the vehicles or to surfaces within the cavity wax booth. Therefore, there are no particulate matter emissions estimated for the cavity wax application process,

Paint Mix Room

Paints, reducing solvents, purge solvents, and cleaning solvents will be stored, mixed, and dispensed in the paint mix room. These materials are supplied in drums or totes and fed to closed mix tanks for viscosity adjustment. The paints are pumped through continuously circulating paint lines from the mix tanks to the application equipment. The systems are designed to minimize VOC emissions during the use or mixing of paints and solvents.

Abatement Equipment

The VOC emissions from the E-coat tank and oven, topcoat booths, topcoat booths, Tutone booths, and Tutone ovens as described above will be directed to two (2) RTOs for VOC destruction as follows: ovens and flash off areas Each RTO will operate with a minimum destruction efficiency of 95%. The RTOs will be electric and will not require fuel combustion.

Assembly Shop

The assembly shop is a series of conveyors where mechanical, electrical, and trim parts are installed on the painted bodies received from the paint shop. The major areas of the assembly shop operations include the floor line, trim line, chassis/battery line, and final repair. Most operations conducted in these areas do not generate any air emissions, including installation of sound-deadeners, and brake lines, as well as installation of various small parts, carpeting, seats, windows, bumpers and wheels. The air emission sources in the assembly shop are described in the following sections.

Windshield Installation

Windshield glazing activities include the application of primers and adhesives. A primer is used in the direct glazing process and an adhesive binds the windshield to the car body. VOC emissions associated with the windshield installation are exhausted through the roof.

Final Repair

Final inspection may reveal damage to the painted surface. If a body panel or spot requires painting, the vehicle is sent to final repair. This repair operation differs from the repair operations in the paint shop in that it is designed to repair finished vehicles. Small spot repairs will be conducted in various areas within the assembly shop, while larger repairs will be conducted within a repair booth. In final repair, primer, basecoat, and clearcoat are applied using high volume low pressure (HVLP) spray guns. Overspray particulate emissions in the repair booth are controlled using dry filtration. No overspray particulate emissions are expected from the small spot repair operations throughout the assembly area. After necessary repairs have been completed, vehicles are buffed, polished, and sent to staging for delivery to dealers. VOC emissions from polish are exhausted through general building ventilation.

Fluid Filling

After the installation of mechanical, electrical, and trim components, the vehicle is sent for the addition of necessary fluids. Fugitive emissions from ethanol-based windshield washer fluid filling are exhausted through general facility ventilation and represent the only fluid filling emissions. Any other fluids have negligible vapor pressure and do not emit VOCs.

Support Operations

Combustion Sources

The stamping area, body shop, paint shop, and assembly shop will be heated by natural gas-fired rooftop units.

Fluid Storage

The facility will utilize storage tanks for materials utilized at the facility, including windshield washer fluid, purge solvent, and diesel fuel. All storage tanks are aboveground storage tanks (ASTs). A detailed list of tank contents and sizes for tanks with VOC emissions is provided in the air quality permit application forms.

Miscellaneous Cleaning Solvents

In addition to the purge solvents used in the paint-shop, various cleaning solvents are used throughout the facility. VOC emissions from cleaning solvents are emitted through general building ventilation.

Cooling Towers

Cooling towers will be utilized to provide process cooling to process operations.

Emergency Generators and Fire Pump

The proposed facility will include diesel-fired emergency fire pumps and emergency generators for emergency events.

Paved Roads

Paved roads will be utilized by utility trucks to deliver raw materials and ship final products and will also be utilized by production vehicles.

OPERATING PERMIT STATUS

This is the initial construction permit for this facility. When constructed, the facility will be required to submit a Title V operating permit application within 12 months of startup.

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EMISSIONS

Emissions calculations can be found in the excel spreadsheet.

PROJECT EMISSIONS						
Pollutant	**Uncontrolled**		**Controlled**		**PTE**	
	lb/hr	**TPY**	**lb/hr**	**TPY**	**lb/hr**	**TPY**
PM	21.97	61.04	14.68	39.92	14.68	39.92
PM_{10}	13.56	36.57	6.27	15.46	6.27	15.46
$PM_{2.5}$	11.93	31.76	4.64	10.46	4.64	10.46
NOx	75.78	117.09	--	--	75.78	117.09
VOC	1,059.13	4,589.87	461.93	1,371.89	461.93	1,371.89
CO	57.47	99.72	--	--	57.47	<100.0
SO_2	5.02	2.61	--	--	5.02	2.61
Pb	2.72E-4	1.19E-3	--	--	2.72E-4	1.19E-3
Total HAPs	207.0	905.0	--	--	207.0	905.0
CO_2e	68,108	287,588	--	--	68,108	287,588

SOURCE TEST REQUIREMENTS

The facility will be required to source test the RTO within 180 days of startup and every 4 years after the initial source test.

REGULATIONS

Applicable - Section II(E) *(Synthetic Minor)*

Synthetic Minor Limits					
Permit ID	**Equipment ID**	**Permit Issue Date**	**Pollutant**	**Emission Limit (TPY)**	**Explanation**
--	Facility-wide	This Permit	CO	<100.0	PSD avoidance

Not Applicable - Standard No. 1 *(Emissions from Fuel Burning Operations)*
All fuel burning sources are direct fired.

Applicable - Standard No. 3 (state only) *(Waste Combustion and Reduction)*
The RTOs are subject to this regulation.

(S.C. Regulation 61-62.5, Standard No. 3, Section IX(D)) An exemption from all of the Operator Training Requirements in S.C. Regulations 61-62.5, Standard No. 3, Section IX(C) has been granted for the RTOs. This is a State Only

requirement.

Applicable - Standard No. 4 *(Emissions from Process Industries)*
Section IX: All equipment is subject to a 20% opacity limit.
Section VIII:

Process	Max Process Weight Rate (tons/hr)	PM Allowable at Max (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
Stamping, Body Shop, Paint Shop and Assembly	74.41	48.36	21.97	14.68	N/A

Not Applicable - Standard No. 5 *(Volatile Organic Compounds)*
The facility did not exist in 1979 or 1980.

Not Applicable - Standard No. 5.2 *(Control of Oxides of Nitrogen (NOx))*
All sources have undergone BACT analysis for NOx and are therefore exempt from this regulation.

Applicable - Standard No. 7 *(Prevention of Significant Deterioration)*
CO emissions were slightly below the significant emission level. As a pre-caution the facility took a synthetic minor limit of < 100.0 TPY of CO. The table below contains sources that received numerical emission limits. Sources that only received practice standards are not listed below; see PD and/or the permit.

PSD Limits					
Permit ID	**Equipment ID**	**Permit Issue Date**	**Pollutant**	**Emission Limit**	**Explanation**
--	Rooftop Units	This Permit	PM (total)	0.0005 lb/MMBtu	BACT
--	Rooftop Units	This Permit	PM_{10}	0.0005 lb/MMBtu	BACT
--	Rooftop Units	This Permit	$PM_{2.5}$	0.0004 lb/MMBtu	BACT
--	Topcoat/Tutone	This Permit	PM (filterable)	1 mg/m^3 (dscf)	BACT
--	Topcoat/Tutone	This Permit	PM_{10}	1 mg/m^3 (dscf)	BACT
--	Topcoat/Tutone	This Permit	$PM_{2.5}$	1 mg/m^3 (dscf)	BACT

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PSD Limits					
Permit ID	**Equipment ID**	**Permit Issue Date**	**Pollutant**	**Emission Limit**	**Explanation**
--	Spot and Assembly Repair	This Permit	PM (filterable)	0.075 lb/hr	BACT
--	Spot and Assembly Repair	This Permit	PM_{10}	0.075 lb/hr	BACT
--	Spot and Assembly Repair	This Permit	$PM_{2.5}$	0.075 lb/hr	BACT
--	Emergency Engines	This Permit	PM* (Total)	0.15/0.22 g/hp*hr	BACT
--	Emergency Engines	This Permit	PM_{10}*	0.15/0.22 g/hp*hr	BACT
--	Emergency Engines	This Permit	$PM_{2.5}$*	0.15/0.22 g/hp*hr	BACT
--	Body Shop	This Permit	PM (Filterable)	0.04 lb/hr	BACT
--	Body Shop	This Permit	PM_{10}	0.04 lb/hr	BACT
--	Body Shop	This Permit	$PM_{2.5}$	0.04 lb/hr	BACT
--	Rooftop Units	This Permit	VOC	0.0054 lb/MMBtu	BACT
--	E-Coat	This Permit	VOC	0.23 lbs/GACS	BACT
--	Sealer, Adhesive and Underbody PVC	This Permit	VOC	0.25 lbs VOC/gal	BACT
--	Topcoat/Tutone	This Permit	VOC	3.53 lbs/GACS	BACT
--	Paint Shop / Assembly Spot Repair	This Permit	VOC	4.8 lbs VOC/gal	BACT
--	Cavity Wax	This Permit	VOC	1.0 lbs VOC/gal	BACT
--	Purge Solvent	This Permit	VOC	385.82 tpy	BACT

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PSD Limits					
Permit ID	**Equipment ID**	**Permit Issue Date**	**Pollutant**	**Emission Limit**	**Explanation**
--	Cleaning Solvent	This Permit	VOC	58.8 tpy	BACT
--	Vehicle Polish	This Permit	VOC	3.37 tpy	BACT
--	Body Shop Adhesives	This Permit	VOC	0.0005 lb VOC/lb coating	BACT
--	Window and Windshield Glazing / Mounting	This Permit	VOC	0.4 lb VOC/gal	BACT
--	Emergency Engines	This Permit	VOC*	0.32/1.14 g/hp*hr	BACT
--	Rooftop Units	This Permit	NOx	0.043 lb NOx/MMBtu	BACT
--	Emergency Engines	This Permit	NOx*	4.77/2.98/3.00 g/hp*hr	BACT
--	Rooftop Units	This Permit	CO_2e	118 lb CO_2e/MMBtu	BACT
--	Emergency Engines	This Permit	CO_2e	164 lb CO_2e/MMBtu	BACT

* Emergency engine limits are taken from 40 CFR 63 Subpart ZZZZ and are dependent on horsepower

Applicable - 61-62.6 *(Control of Fugitive Particulate Matter)*
The facility is subject to the statewide requirement of section III.

40 CFR 60 and 61-62.60 *(New Source Performance Standards (NSPS))*

Applicable – Subpart MMa (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations for which Construction, Modification or Reconstruction Commenced After May 18, 2022) – The assembly, painting and solvent operations at this facility will be subject to this subpart.

Applicable – Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) - The emergency generators and fire pumps will be subject to this regulation.

Not Applicable - Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification

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Commenced After July 23, 1984) – While the facility will store volatile organic liquids in storage tanks, the storage tanks will not be larger than 19,813 gallons.

40 CFR 61 and 61-62.61 *(National Emission Standards for Hazardous Air Pollutants (NESHAP))*

Not Applicable – The facility is not in one of the subject source categories.

40 CFR 63 and 61-62.63 *(National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories)*

Applicable - Subpart IIII (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks) – The facility is subject to this subpart.

Applicable – Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) – The rooftop units and the emergency engines/fire pumps are subject to this subpart. Compliance will be demonstrated by complying with 40 CFR 60 Subpart IIII.

Not Applicable - Subpart Q (National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers) – The facility will not use chromium based water treatment.

Not Applicable - Subpart EEEE (National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)) – This subpart was reviewed for applicability of the windshield wiper fluid. Although it contains a concentration of ethylene glycol greater than 5%, the vapor pressure is below applicability thresholds. Therefore, this subpart does not apply.

Not Applicable - Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) – The facility will not coat plastic parts at this location.

Not Applicable - 61-62.68 *(Chemical Accident Prevention Provisions)*
The facility will not use or store the subject chemicals above threshold values.

Applicable - 40 CFR 64 *(Compliance Assurance Monitoring)*
The RTOs will be subject to CAM. As they will controlling large units, the CAM plan will be due with the initial Title V application.

AMBIENT AIR STANDARDS REVIEW

Applicable - Standard No. 2 *(Ambient Air Quality Standards)*
The facility has demonstrated compliance through modeling (see modeling summary dated 08/01/2023).

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Not Applicable - Standard No. 8 (state only) *(Toxic Air Pollutants)*
All TAPs are either regulated under 40 CFR 63 subpart IIII, 40 CFR 63 subpart ZZZZ, from burning natural gas or are below de minimis levels and are exempt from modeling.

PERIODIC MONITORING

ID	Regulatory Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
Rooftop Units	All limits	Operation and maintenance checks	Annual	Semiannual	More stringent MACT requirements uses annual tune-ups for larger fuel burning sources (> 10MMBTU/hr); therefore annual O&M is sufficient for these smaller sources.
Emergency Engines	All limits	Operation and maintenance checks	Manufacturers recommendation	Semiannual	40 CFR 63 Subpart ZZZZ
Emergency Engines	PM, PM_{10}, and $PM_{2.5}$ limits	Opacity	Semiannual	Maintain on site	Visual inspections to ensure compliance with PM, PM_{10}, and $PM_{2.5}$ limits. Minimal emissions expected
Topcoat/ Tutone	1 mg/m^3 $PM/PM_{10}/PM_{2.5}$ (each)	Pressure Drop	Daily	Semiannual	Control device operating within proper range will ensure compliance with limits
Spot and Assembly Repair	0.075 lb/hr PM 0.075 lb/hr PM_{10} 0.075 lb/hr $PM_{2.5}$	Visual Inspection	Weekly	Semiannual	Minimal emissions expected
Body Shop	0.04 lb/hr PM 0.04 lb/hr PM_{10} 0.04 lb/hr $PM_{2.5}$	Pressure Drop	Daily	Semiannual	Control device operating within proper range will ensure compliance with limits
Cooling Towers	0.001% drift rate	Visual Inspections	Monthly	Semiannual	Minimal emissions expected

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ID	Regulatory Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
E-Coat	0.23 lbs VOC /GACS	Material Balance/ Temperature	Monthly/ Continuous	Semiannual	Recordkeeping and reporting consistent with 40 CFR 63 Subpart IIII
Sealer, Adhesive and Underbody PVC	0.25 lbs VOC/gal	Material Balance/ Temperature	Monthly/ Continuous	Semiannual	Control device operating above minimum temperature will ensure compliance with limits
Topcoat/ Tutone	3.53 lbs VOC /GACS	Temperature	Continuous	Semiannual	Control device operating above minimum temperature will ensure compliance with limits
Paint Shop / Assembly Spot Repair	4.8 lbs VOC/gal	Material Record Keeping	Monthly	Semiannual	Limited use expected
Cavity Wax	1.0 lbs VOC/gal	Material Record Keeping	Semiannual	Semiannual	Recordkeeping and reporting consistent with 40 CFR 63 Subpart IIII
Purge Solvent	385.82 tpy	Material Record Keeping	Monthly	Semiannual	Recordkeeping and reporting consistent with 40 CFR 63 Subpart IIII
Cleaning Solvent	58.8 tpy	Material Record Keeping	Monthly	Semiannual	Recordkeeping and reporting consistent with 40 CFR 63 Subpart IIII
Vehicle Polish	3.37 tpy VOC	Material Record Keeping	Monthly	Semiannual	Recordkeeping and reporting consistent with 40 CFR 63 Subpart IIII
Body Shop Adhesives	0.0005 lb VOC/lb coating	Material Record Keeping/ Temperature	Continuous	Semiannual	Control device operating above minimum temperature will ensure compliance with limits
Window and Windshield Glazing / Mounting	0.4 lb VOC/gal	Material Record Keeping	Semiannual	Semiannual	Recordkeeping and reporting consistent with 40 CFR 63 Subpart IIII

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ID	Regulatory Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
Facility-wide (except rooftop units, road and emergency engines)	Opacity	Visual inspection	Semiannual	Semiannual	Minimal opacity expected/all operations are enclosed

PUBLIC NOTICE

This construction permit(s) will undergo a 30-day public notice period, in accordance with SC Regulation 61-62.1, Section II(N) and SC Regulation 61-62.1, Section II(E) to establish the PSD avoidance limit of 100.0 tpy of CO and SC Regulation 61-62.5, Standard 7(q) to establish BACT limits. The comment period was open from September 7, 2023 to October 18, 2023 and was placed on the BAQ website during that time period. Comments were received during the comment period. The comments had no technical merit and are summarized and addressed in the *Response to Comments on Air Quality*.

Additional Public Participation

On September 19, 2023, BAQ staff participated in the TeamSC Community Open House with other agencies to answer questions from the public about the proposed project.

On October 12, 2023, the BAQ held a public hearing to accept written and verbal comments on the draft air construction permit for the proposed project.

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.