INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
Northern Regional Office • 300 N. Dr. Martin Luther King Jr. Blvd, Suite 211 • South Bend, IN 46601-1295
(800) 753-5519 • (574) 245-4870 • Fax (574) 245-4877 • www.idem.IN.gov
Eric J. Holcomb
Governor
Brian C. Rockensuess
Commissioner

July 2, 2024

VIA ELECTRONIC MAIL
Ms. Monica Klaas
Subaru of Indiana Automotive, Inc.
P.O. Box 5689
Lafayette, IN 47903
monica.klaas@subaru-sia.com

Re: Inspection Summary Letter
Subaru of Indiana Automotive, Inc.
Source ID 157-00050
Lafayette, Tippecanoe County

Dear Ms. Monica Klaas:

On June 24, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Subaru of Indiana Automotive, Inc., located at 5500 State Road 38 East and I-65 corner E 200 in Lafayette, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: No violations were observed

Please direct any questions to me at 574-229-4303 or by email at 574-229-4303.

Sincerely,
Paul Karkiewicz
Paul Karkiewicz, Compliance Inspector
Northern Regional Office
Office of Air Quality

ACES ID: 298749

cc: Paul Karkiewicz, Compliance and Enforcement Branch, Office of Air Quality

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT

SOURCE INFORMATION	
SOURCE NAME	Subaru of Indiana Automotive, Inc.
SOURCE LOCATION	5500 State Road 38 East and I-65 corner E 200, Lafayette, Indiana Tippecanoe County
MAILING ADDRESS	P.O. Box 5689, Lafayette, IN 47903
PLANT ID	157-00050
PERMIT INFORMATION	Permit Type: TVOP Permit Number: 47627 Permit Expiration Date: April 6, 2026 VFC Document No.(hyperlink): 83637432
ATTAINMENT STATUS	☒ Attainment for all criteria pollutants ☐ Nonattainment for ☐SO_2 ☐CO ☐O_3 ☐NO_2 ☐Pb ☐PM_{10} ☐$PM_{2.5}$
SOURCE STATUS	☒ PSD Major (326 IAC 2-2) ☒ Major Source of HAPs ☐ Emission Offset (326 IAC 2-3) ☐ Area Source of HAPs ☐ Acid Rain (326 IAC 21)
SOURCE DESCRIPTION	Stationary automotive and sport utility vehicle assembly plant.

INSPECTION INFORMATION			
INSPECTED BY	Paul Karkiewicz, John Alexander		
INSPECTION DATE AND TIME	June 24, 2024	TIME IN: 8:20 AM	TIME OUT: 3:10 PM
REPORTED BY PSK	Paul Karkiewicz	REPORT DATE: June 28, 2024	
COMPLIANCE PERIOD REVIEWED	September 29, 2022, to June 24, 2024		
INSPECTION NOTIFICATION	☒ Unannounced ☐ Announced:		
INSPECTION OBJECTIVE(S)	☒ Compliance Monitoring Strategy (CMS) ☐ Commitment ☐ Mega-Site: ☐ FCE ☐ PCE ☐ Complaint ☐ Other: ☐ Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 298749	Complaint:	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint:		
INSPECTION BACKGROUND	Purpose of Inspection: To determine compliance with the company's permit and any additional state or federal air rules. The source normally operates 2 production shifts per day, 5 days per week.		

SOURCE PERSONNEL INTERVIEWED			
Name	*Title*	*Phone Number*	*Email Address*
Monica Klaas	Manager, Environmental Compliance & Energy	765-428-7668	monica.klaas@subaru-sia.com
Kayla Gibbons	Environmental Consultant, Keramida	219-241-7994	kgibbons@keramida.com
Jessica Smith	Environmental Specialist		Jessica.smith@subaru-sia.com
Preston Smith	Environmental Specialist	765-449-6008	
Brenda Wiler	Manager, Paint		
Chris Corso	Paint Department		

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	*Inspection/Complaint Type*	*Result*	*Comments*
9/28/2022	CMS	No Violations Noted	
9/29/2020	CMS	Violations Noted	Violations handled through enforcement action 2020-27424-A
9/27/2018	CMS	Violations Noted	Violations handled through Violation Letter issued 11/2/2018
9/27/2016	CMS	Violations Noted	Violations handled through enforcement action 2016-24146-A

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)

Informal Enforcement Actions

Date Issued	*Action Taken*	*Describe Violation(s)*
8/31/2021	Violation Letter	Violations discovered during the review of the 2020 Annual Compliance Certification: 1) Subaru of Indiana Automotive, Inc., failed to maintain records of the required tune-ups for the boilers identified as B09-1, B09-2, and B09-3, in violation of 40 CFR 63, Subpart DDDDD, and Condition E.4.2(b) of TVOP 157-42318-00050. 2) Subaru of Indiana Automotive, Inc., failed to maintain records for the year of 2020 to demonstrate compliance with the maintenance requirements for the two (2) 375 horsepower (Hp) diesel fired emergency fire pumps, in violation of 40 CFR 63, Subpart ZZZZ, and Condition E.6.2(16) of TVOP 157-42318-00050
11/2/2018	Violation Letter	On several occasions, the source failed to take corrective action when the fan amperage for catalytic incinerator (B-ED), which controls emissions from the electrodeposition body coating line, went outside the normal range. Source failed to submit semi-annual compliance report for the period of January 1 through June 30, 2017, by no later than July 31, 2017.

Formal Enforcement Actions

Case Number	*Enforcement Type*	Civil Penalty	Describe Violation(s)
2020-27424-A 2017-24301-A 2016-23742-A	Formal Enforcement	$ 320,443	Source exceeded the 10.96 lb/gallon VOC limit for the topcoat system on the paint #2 line (unit 016) on 10/1/2019. Source failed to maintain overall control efficiency of 21% on the thermal oxidizer for PFPLS#2. The source submitted a self-disclosure for construction and operation / modification of various emission units without an appropriate permitting.
2016-24146-A	Formal Enforcement	$ 4,500	The facility failed to submit quarterly reports to IDEM of the daily VOC emissions from the Touchup painting booth (Unit 007) and the anticorrosion booth (unit 006). On various instances, since the new minimum 3-hour average operating temperature for the regenerative thermal oxidizer (RTO-TC123) was established at the most recent stack testing conducted in 2014 from August 18th – 22nd, the source failed to take appropriate corrective action when the temperature was below 1,526^{o}F. On various instances, since the minimum 3-hour average operating temperature for the thermal oxidizer (TO-C1) was established at the most recent stack testing conducted in 2016 on April 19th, the source failed to take appropriate corrective action when the temperature was below 1,612^{o}F.

Other Relevant Actions

Action Taken	*Comments*
N/A	

PERMIT SECTION D.1

Emission Units and Control Devices:

Source-Wide Operations

Pollutants with Emission Limits or Applicable Standards:

☒ SO_2 ☒ NO_X ☒ CO ☒ VOC ☒ PM ☒ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-1-6

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: vehicle production, natural gas usage, VOC content of coating materials and solvents, amount of coating materials and solvents used, transfer efficiency and particulate control efficiency of each coating booth		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

On June 24, 2024, the IDEM, Air Compliance Section, - Northern Regional Office performed a CMS Inspection of Subaru of Indiana Automotive, Inc, (SIA), located in Lafayette, Tippecanoe County. An Opening Meeting was conducted with Ms. Monica Klaas to discuss the objectives of the inspection and the records required for review. Ms. Klaas then led an inspection of the SIA production processes.

The surface coating operations at the facility consist of the following process. First the vehicle bodies are dip coated using electrodeposition to provide the initial anticorrosion protection. Then the bodies go through a sealing step, which is a combination of robotic application and manual application for the finer detailed areas. Then the bodies are sprayed with a primer and a topcoat. These processes are all automated with robotic spray application systems.

Summary of the Emission Units and Control Equipment at the Facility

		Control Equipment	
		VOC	**Particulate**
Plant A/B (Paint 1)			
Unit 001	Electrodeposition Coating	Catalytic Oxidizer (B-ED)	
Unit 002	Sealing and PVC Undercoating		Dry Filters
Unit 003	Topcoat (Booths #1, #2, and #3)	Thermal Oxidizer (RTO-TC123)	Water Wash System
Unit 004	Intermediate Surfacer Coating	Catalytic Oxidizer (SUR)	Water Wash System
Unit 005	Plastic Bumper Coating Line 1	Thermal Oxidizer (PBL)	Water Wash System
Unit 005B	Plastic Bumper Coating Line 2		Water Wash System
Unit 006	Anticorrosion Coating		Dry Filters
Unit 007	Final Repair Touchup Coating		
Unit 010	Trim Line		
Unit 011	Storage Tanks		
Unit 012	Purge Solvent usage and capture		

The facility is using block painting whenever possible to minimize color changes and resulting use of purge solvents. All the robotic spray application systems have dedicated lines for each paint color that run from the paint room to the spray nozzle. The only purging is during a color change and that is a very small amount in the tip of the spray nozzle.

PERMIT SECTION D.1

A purge capture system is used each time that any coating application equipment is purged. The purge system is all enclosed. The robotic arm marries with the purge pot which encloses around the spray nozzle during cleaning and purging. Collected purge solvents are retained in a closed conveyance system to the solvent storage tank and in closed containers until such time as they are shipped offsite for disposal or recycling.

The facility maintains copies of the training program, which covered the proper set-up and operation of the water wash and dry filter control system. Every employee with contact to the surface coating operations at the facility is trained as soon as they are hired. SIA provided copies of the tests that are given to associates who perform surface coating operations using spray equipment and conduct booth maintenance. Refresher training is given annually.

The source wide (12 month rolling total) emissions calculations for VOC requires the control efficiency of each booth. This is only for those units that have control equipment (oxidizers) and is specified via stack testing. PM emissions required solids transfer efficiency of the applicators and overall PM control efficiency from manufacturing data. The facility is using 99.5% control efficiency from manufacturer data for their water wash systems and dry filters. Transfer efficiency is established via testing as specified above and using available data such as AP-42 for the remainder of lines (PVC coating line at 80%, Sealer coating line at 95%, and Black and Wax coating line depends on the product used with the inner panel coating at 80%, underfloor coating at 66%, and wheel black resin at 30%). Transfer efficiency for electrodeposition is assumed at 100%.

	Permit Limit (per rolling 12-month period)
Source Wide – Plant A/B	
Production Totals of the entire facility (Plant A/B and C)	514,000 vehicles
Natural Gas Usage	2,375 MMcf
PM / PM10 Emissions	23.1 tons
VOC Emissions	1,084.5 tons

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.2

Emission Units and Control Devices:

Emissions Unit Description:

(e) Plastic Bumper Coating Line A (PBL-A), identified as Unit 005, constructed in 1989, modified in 2010, and approved in 2017 to allow balancing of the plant's two plastic bumper coating lines (Unit 005 and Unit 005B) to support the production of 257,000 vehicles per year on each line, consisting of the following units**:**

(1) PBL-A Paint Booth

(A) One (1) PBL-A Paint Booth, utilizing the air atomization and electrostatic bell methods of spraying, using a water wash as particulate matter control, and exhausting to four (4) stacks, identified as BPR-1, BPR-2, BPR-JR, and BPR-AP.

(B) One (1) PBL-A Paint Booth direct fired natural gas ASH unit, with a 30 MMBtu/hr pre-heat burner and 6 MMBtu/hr reheat burner.

(C) Two (2) Heated Flash-Offs (HFOs) between the basecoat and clearcoat zones, each with one (1) indirect fired natural gas burner, with a heat input capacity of 0.8 MMBtu/hr.

(2) PBL-A Paint Oven

(A) One (1) PBL-A Paint Oven with two (2) direct fired natural gas burners (oven zones #2 and #3), each with a heat input capacity of 1.6 MMBtu/hr, using a 2.24 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR-Inc.

(3) One (1) PBL-A Cool Down area.

(4) One (1) paint mixing room.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☒ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-1-6
- 326 IAC 6-3-2
- 326 IAC 6-2-4

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount used, volume weighted average VOC content each day, temperature 3-hr average on incinerator, duct pressure or fan amperage on incinerator, operator training program records, water wash system records (daily inspections, semi-annual stack inspections)		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

PERMIT SECTION D.2

Observations and Comments:

The plastic bumper coating line and associated thermal incinerator was operating during the inspection with no visible emissions observed. The facility provided historical logs to document that they were conducting daily (per shift) visual inspections of the water wash flood pans, water circulation, and warning system on the circulation pump on the following coating booths.

Plant 1 - Plastic Bumper Coating Line (Unit 005)
Plastic Bumper Coating Line (Unit 005B)

Also, they provided documentation of the semiannual assessment of overspray from the following stack exhausts.

Plant 1 - Plastic Bumper coating booth stacks (BPR-1, BPR-2, BPR-JR, and BPR-AP)
Plastic Bumper coating booth stacks (Unit 005B)

On all their oxidizers the facility is continuously monitoring and recording the operating temperature every minute and translates that to a 3-hour average for historical review. Time periods of non-production are indicated in these logs. The facility is also monitoring fan amperage on their oxidizers daily. See summary chart below for the readings taken during the inspection.

Thermal Oxidizer / Catalytic Incinerator		Observed during Inspection		Minimum established at most recent stack testing	
		Temperature (3-hr avg)	Duct Pressure / Fan Amperage	Temperature	Duct Pressure / Fan Amperage
Unit 005	Plastic Bumper Line (PBL)	1416° F	16 amps	1407 °F	16 amps

The control logic for the VOC emission control devices (thermal oxidizers and catalytic incinerators) is set up such that when the temperature reaches a predetermined lower limit an alarm makes that known to the operator who then takes corrective action. The lower limits for temperature on all control devices is at the minimum temperature established at the most recent stack testing.

	Set Point	Lower Limit
Unit 005 – Plastic Bumper Line (PBL)	1415 °F	1407 °F

Stack testing was conducted as summarized in the chart below (Thermal Incinerator VOC Destruction Efficiency performed on May 20, 2019, VOC Capture Efficiency performed on August 3, 2023) to demonstrate compliance with the VOC destruction efficiency, which is permitted at a minimum of 90%. The minimum 3-hour avg operating temperature and fan amperage or duct pressure were also established during stack testing. The capture and transfer efficiency testing information are used to calculate the daily VOC emissions per permitted equations.

STACK TESTING Thermal Oxidizer / Catalytic Incinerator		Transfer Efficiency	VOC control efficiency		
			Capture	Destruction	
		Measured during stack testing			Permitted minimum
Unit 005	Plastic Bumper Line Oven (PBL)	54%	15.02%	95.7%	90%

5-year retesting of the above units was performed on April 15, and 19, 2024. However, the results of this testing have not yet been certified by the OAQ – Compliance Data Section.

The source is reporting VOC emissions in compliance with the following permit limits. The VOC content for each emission unit is specifically calculated as a daily average and takes into account the transfer efficiency of the applicators and control efficiency of oxidizers in the calculations for those units with control equipment. Most of the paints are already compliant coatings with only a few colors that are noncompliant and thus triggering the need for daily weighted averaging.

PERMIT SECTION D.2

	Permit Limit (per rolling 12-month period)
Plant A/B - Plastic Bumper Line	
Unit 005	38.2 lbs/gallon
Unit 005B – primer coating	0.71 lbs/gallon
Unit 005B – basecoat coat	1.38 lbs/gallon
Unit 005B – clearcoat coat	4.09 lbs/gallon

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.3

Emission Units and Control Devices:

Emissions Unit Description:

(g) Plastic Bumper Coating Line B (PBL-B), identified as Unit 005B, constructed in 2006, approved in 2014 for physical modification and operational change as part of the "2014 Increase in Capacity Project" for the plastic bumper coating operations of Subaru vehicles. This project involves an increase in capacity from 110,000 to 250,000 vehicles per year, and approved in 2017 to allow balancing of the plant's two plastic bumper coating lines (Unit 005 and Unit 005B) to support the production of 257,000 vehicles per year on each line, consisting of the following:

(1) PBL-B Paint Booth

(A) One (1) primer spray zone in Unit 005B booth, with robotic spray applicators utilizing air atomized application techniques as approved in 2014 with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(a).

(B) One (1) basecoat spray zone, with robotic spray applicators utilizing bell application techniques as approved in 2014, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(b).

(C) One (1) clearcoat spray zone, with robotic spray applicators utilizing bell application techniques as approved in 2014, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(c).

(D) One (1) PBL-B Paint Booth direct fired natural gas ASH unit, with a 32 MMBtu/hr pre-heat burner and 2.72 MMBtu/hr reheat burner.

(E) Two (2) Heated Flash-Offs (HFOs) between the basecoat and clearcoat zones, each with one (1) direct fired natural gas burner, with a heat input capacity of 1.5 MMBtu/hr.

(F) Six (6) back-up manual spray applicators approved in 2014 for construction.

(2) PBL-B Paint Oven

(A) One (1) PBL-B Paint Oven with three (3) indirect fired natural gas burners (oven zones #1, #2 and #3), with a heat input capacity of 1.5 MMBtu/hr, 2.5 MMBtu/hr, and 1.6 MMBtu/hr, without VOC control, exhausting to one (1) stack, identified as PB2(g). Approved in 2014 to increase oven length and add the 1.6 MMBtu/hr burner.

(3) One (1) PBL-B Cool Down area.

(4) One (1) paint mixing room.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-1-6
- 326 IAC 6-3-2
- 326 IAC 6-2-4

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount of coating materials and solvents used, volume weighted average VOC content each day, Operator training program records		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

See section D.2 for details

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.4

Emission Units and Control Devices:

Emissions Unit Description:

(a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:

(1) One (1) Body Pretreatment area.

(A) One (1) Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 2.5MMBtu/hr.

(B) Six (6) insignificant pretreatment boilers, with a total heat input capacity of 9.0 MMBtu/hr.

(2) One (1) ED Coating System

(A) One (1) ED Coating Tank, utilizing dipping as the method of application.

(B) One (1) ED Body Oven, with two (2) indirect fired and three (3) direct fired natural gas burners (oven zones #1 through #5) each with a heat input capacity of 2.5 MMBtu/hr, using a 3.0 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust).

(C) One (1) ED Body Cool Down area

(D) One (1) ED paint storage room.

(c) Topcoat System, identified as Unit 003, constructed in 1989, modified in 2006, 2008, 2009, 2010, 2013, 2016, and approved in 2024 for modification, consisting of the following units:

(1) Topcoat #1 (B) Booth

(A) One (1) Topcoat #1 (B) Booth, approved in 2024 to replace existing spray applicators with automated electrostatic bell type spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10.

(B) Three (3) Topcoat #1 (B) Booth direct fired natural gas ASH units (ASH #1, #2, and #3), each with a 21.6 MMBtu/hr pre-heat burner and 8.4 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones with one (1) indirect fired natural gas burner, with a heat input capacity of 3.2 MMBtu/hr.

PERMIT SECTION D.4

(2) Topcoat #1 (B) Oven

(A) One (1) (B) Topcoat #1 Oven, approved in 2013 for modification, with three (3) direct fired natural gas burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #1 (B) Oven are not controlled and exhaust to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas auxiliary heater with a heat input capacity of 2.5 MMBtu/hr.

(3) One (1) Topcoat #1 (B) Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.

(4) Topcoat #2 (A) Booth

(A) One (1) Topcoat #2 (A) Booth, approved in 2016 for modification to replace existing spray applicators with automated electrostatic bell type spray applicators, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10.

(B) Three (3) Topcoat #2 (A) Booth direct fired natural gas ASH units (ASH #1, #2, and #3), each with a 40.8 MMBtu/hr pre-heat burner and 2.3 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones, with one (1) indirect fired natural gas burner, with a heat input capacity of 3.5 MMBtu/hr.

(5) Topcoat #2 (A) Oven

(A) One (1) Topcoat #2 (A) Oven, approved in 2013 for modification, with three (3) direct fired natural gas burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #2 (A) Oven are not controlled and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas auxiliary heater with a heat input capacity of 2.5 MMBtu/hr.

(5) One (1) Topcoat #2 (A) Cool Down area, using no controls, and exhausting to one (1) tack, identified as TC-2.

PERMIT SECTION D.4

(7) Topcoat #3 (C) Booth

(A) One (1) Topcoat #3 (C) Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5.

(B) Two (2) Topcoat #3 (C) Booth direct fired natural gas ASH units (ASH #1, and #2), each with a 24.5 MMBtu/hr pre-heat burner and 1.8 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones, with one (1) indirect fired natural gas burner, with a heat input capacity of 1.6 MMBtu/hr.

(8) Topcoat #3 (C) Oven

(A) One (1) Topcoat #3 (C) Oven, approved in 2013 for modification, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 2.5 MMBtu/hr and two (2) each with a heat input capacity of 1.5 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #3 (C) Oven are not controlled and exhaust to one (1) stack, identified as TC-3 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas flash-off heater between the basecoat and clearcoat zones, with a heat input capacity of 1.6 MMBtu/hr.

(9) One (1) Topcoat #3 (C) Cool Down area, using no controls.

(10) Paint 1 main mix room.

(d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations, approved in 2023 for modification to replace two (2) manual air-assisted spray guns with interior robot e-stat painting process, consisting of the following units:

(1) Intermediate Coating Booth

(A) One (1) Intermediate Coating Booth, utilizing, two (2) robots, for the application of anti-chip (ACC), the interior robot e-stat painting process, followed by the exterior robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7.

(B) Two (2) Intermediate Coating Booth direct fired natural gas ASH units (ASH #1 and #2), each with a 29.9 MMBtu/hr pre-heat burner and 8.2 MMBtu/hr reheat burner.

PERMIT SECTION D.4

(2) Intermediate Coating Oven

(A) One (1) Intermediate Coating Oven with one (1) indirect fired and four (4) direct fired natural burners (oven zones #1, #2, #2B, #3, and #4), each with a heat input capacity of 2.5 MMBtu/hr, using a 1.5 MMBtu/hr natural gas-fired catalytic incinerator as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust)

(3) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.

(4) Paint 1 main mix room

(l) One (1) working stage direct fired natural gas ASH unit with a heat input capacity of 21.6 MMBtu/hr

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☒ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-2-2
- 326 IAC 6-3-2
- 326 IAC 6-2-4

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount of coating materials and solvents used, volume weighted average VOC content each day, temperature 3-hr average on catalytic incinerators and regenerative thermal oxidizer (RTO), duct pressure or fan amperage on catalytic incinerators and regenerative thermal oxidizer (RTO), operator training program records, water wash system records (daily inspections, semi-annual stack inspections)		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

The paint line was operating during the inspection including electrodeposition, intermediate surface coating, and topcoat with associated VOC control equipment. No visible emissions were observed from this process. Topcoat Booth #3(C) in paint 1 hasn't operated since August 2018 and not anticipating operation anytime soon. All the paint booths pull paint from a centralized paint mix room where all the tanks had enclosed agitation. The paints were pulled from 55-gallon totes and fed into a day bin that was pulled from to feed the lines. There was also a large 2500-gallon tank for virgin solvent and another for waste solvent.

PERMIT SECTION D.4

The facility provided historical logs to document that they were conducting daily (per shift) visual inspections of the water wash flood pans, water circulation, and warning system on the circulation pump on the following coating booths.

Plant 1 - Intermediate Surfacer (Unit 004)
Topcoat Booths #1, 2, and 3 (Unit 003)

Also, they provided documentation of the semiannual assessment of overspray from the following stack exhausts.

Plant 1 - Topcoat Booth #1 stacks (TC1-1 through TC1-10)
Topcoat Booth #2 stacks (TC2-1 through TC2-10)
Topcoat Booth #3 stacks (TUT-1 through TUT-5)

On all their oxidizers the facility is continuously monitoring and recording the operating temperature every minute and translates that to a 3-hour average for historical review. The facility is also monitoring fan amperage on their oxidizers on a daily basis. See summary chart below for the readings taken during the inspection.

Thermal Oxidizer / Catalytic Incinerator		Observed during Inspection		Minimum established at most recent stack testing	
		Temperature (3-hr avg)	Duct Pressure / Fan Amperage	Temperature	Duct Pressure / Fan Amperage
Unit 003	Topcoat (RTO-C123)	1597 °F	2.4 inches	1566 °F	2.4 inches
Unit 004	Intermediate (SUR)	726 °F	42 amps	700 °F	40 amps
Unit 001	Electrodeposition (B-ED)	726 °F	30 amps	700 °F	26 amps

The control logic for the VOC emission control devices (thermal oxidizers and catalytic incinerators) is set up such that when the temperature reaches a predetermined lower limit an alarm makes that known to the operator who then takes corrective action. The lower limits for temperature on all control devices is at the minimum temperature established at the most recent stack testing. The historical temperatures from the topcoat system were more variable at around 1600 to 1640 °F than the remainder of the VOC control oxidizers for the remainder of the plant which were very consistently close to their set points. Also, all the oxidizers in the plant are interlocked with the line conveyors, such that if the oxidizers shut down the production line stops.

	Set Point	Lower Limit
Unit 003 – Topcoat (RTO-C123)	1600 °F	1566 °F
Unit 004 – Intermediate (SUR)	725 °F	700 °F
Unit 001 – Electrodeposition (B-ED)	725 °F	700 °F

Stack testing was conducted on May 21, 22, and 23 of 2019 (ED, Intermediate, and Topcoat, respectively), as summarized in the chart below to demonstrate compliance with the VOC destruction efficiency, which is permitted at a minimum of 90%. The minimum 3-hour average operating temperature and fan amperage or duct pressure were also established during stack testing and is summarized in an earlier chart.
The capture and transfer efficiency testing information are used to calculate the daily VOC emissions per permitted equations.

STACK TESTING Thermal Oxidizer / Catalytic Incinerator		Transfer Efficiency	VOC control efficiency		
			Capture	Destruction	
		Measured during stack testing			Permitted minimum
Unit 003	Topcoat Ovens 1, 2, and 3 (RTO-C123)	71%, 74%, 82%	24.72%	98.97%	90%
Unit 004	Intermediate Surfacer Coating Oven (SUR)	79.4%	20%	98.01%	
Unit 001	Electrodeposition Body Oven (B-ED)	100%	70%	98.42%	

PERMIT SECTION D.4

Capture efficiency for ED was established based on historical documentation in NESHAP and NSPS because there is no easy way to test for capture on the ED line (TSD permit 42849). Capture efficiency for the topcoat oven 1, 2, and 3 (paint line 1) is 24.72% based on internal testing in 2007. No significant changes have taken place since that time.

5-year retesting of the above units was performed on April 16, 17, and 18, 2024. However, the results of this testing have not yet been certified by the OAQ – Compliance Data Section.

The source is reporting VOC emissions in compliance with the following permit limits. The VOC content for each emission unit is specifically calculated as a daily average and takes into account the transfer efficiency of the applicators and control efficiency of oxidizers in the calculations for those units with control equipment. Most of the paints are already compliant coatings with only a few colors that are noncompliant and thus triggering the need for daily weighted averaging.

	Permit Limit (per rolling 12-month period)
Plant A/B	
Paint Line - Electrodeposition and Topcoat	
Unit 001 – ED Body Coating	0.40 lbs/gallon
Unit 003 – Topcoat (1 and 2)	12.3 lbs/gallon
Unit 003 – Topcoat (3)	10.6 lbs/gallon
Unit 003 – Topcoat (1, 2, and 3)	15.1 lbs/gallon
Unit 004 – Intermediate Coating	8.76 lbs/gallon

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.5

Emission Units and Control Devices:

Emissions Unit Description:

(h) Final Repair (Touchup) painting, identified as Unit 007, constructed in 1989 and approved in 2014 to increase capacity, approved in 2016 to increase utilization to accommodate 514,000 vehicles per year including the following equipment:

(1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-2-2

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount of coating materials and solvents used, volume weighted average VOC content each day		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

No painting was being done at the final repair painting booth (Unit 007) at the time of the inspection.
The source is reporting VOC emissions in compliance with the following permit limits.

	Permit Limit (per rolling 12-month period)
Plant A/B - Final Repair	
Unit 007 – Touchup	4.84 lbs/gallon

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.6

Emission Units and Control Devices:

Emissions Unit Description:

(b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 77 units per hour, constructed in 1989 and approved for modification in 2012, consisting of the following units:

(1) PVC Coating Booths

(A) One (1) PVC Coating Booth #1, constructed in 1989, utilizing a combination of manual and automated airless spray application systems, using a dry filter as particulate matter control, approved in 2012 for modification to add additional spray coating application systems, and exhausting to one (1) stack, identified as PVC-1-2.

(B) One (1) PVC Coating Booth #2, constructed in 1999 and modified in 2006, utilizing a combination of manual and automated airless spray application systems, using a dry filter as particulate control, approved in 2012 for modification to add additional spray coating application systems and exhausting to one (1) stack, identified as PVC-Booth 2.

(C) One (1) direct fired natural gas Air Supple House (ASH) unit supplying air to PVC Coating Booth #1 & #2, with a heat input capacity of 16.8 MMBtu/hr.

(2) PVC Coating Oven

(A) One (1) PVC Coating Oven with two (2) direct fired natural gas burners (oven zones #1 and #2), each with a heat input capacity of 2.5 MMBtu/hr.

(3) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling.

(4) One (1) Sound Deadener Operation approved in 2010 for construction, using no controls.

(f) Anticorrosion Coating, identified as Unit 006, constructed in 1989 and modified in 2010. Approved in 2012 for modification to add two (2) spray coating systems at the Black & Wax Booth to allow more vehicles coated hourly, including the following equipment:

(1) Black & Wax and Anticorrosion Coating Booths

(A) One (1) Black & Wax Booth, utilizing the air atomized and air-assisted airless methods of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack.

(B) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate control, exhausting to Anticorrosion Stack.

(C) One (1) direct fired natural gas ASH unit supplying air to the Black & Wax and Anticorrosion Coating booths, with a heat input capacity of 27.6 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-2-9
- 326 IAC 6-3-2

PERMIT SECTION D.6		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount of coating materials and solvents used, volume weighted average VOC content each day, Operator training program records, dry filter inspection and replacement		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

The Sealing and PVC undercoating line was operating during the inspection. Also, the Black Coat and Wax booth were operating during the inspection. No visible emissions were observed from these processes.

Dry filters were in place and being used for particulate control in the Sealing / PVC undercoating booths and the Black Coat / Wax booths. Weekly pressure drop monitoring and monthly filter change records were reviewed.

Plant 1 - PVC Coating booth (Unit 002)
Black and Wax Coating booth (Unit 006)

The source is reporting VOC emissions in compliance with the following permit limits.

	Permit Limit (per rolling 12-month period)
Plant A/B	
Sealing / PVC Undercoating and Black / Wax	
Unit 002 – Sealing/PVC Undercoating Line	0.30 lbs/gallon
Unit 006 – Black/Wax (black phthalic resin)	17.9 lbs/gallon
Unit 006 – Black/Wax (inner panel wax)	6.43 lbs/gallon
Unit 006 – Anticorrosion (underfloor wax)	3.59 lbs/gallon

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.7

Emission Units and Control Devices:

Emissions Unit Description:

(i) Trim Line, identified as Unit 010, application in the Body Shop and Trim Shop of adhesives and sealers to various vehicle parts, constructed in 1989, approved in 2012 for modification which includes increasing the line speed to allow more vehicles to be coated on an hourly basis, approved in 2014 for modification in order to accommodate a production increase from 310,000 vehicles per year to 450,000 vehicles per year, and approved in 2017 for physical modification to increase conveyor speed to allow for an increase in vehicle production from 450,000 to 514,000 vehicles per year:

(1) One (1) Trim Wax application line.

(2) Robotic applicators, permitted in 2016 for construction in the window installation area of Trim Line B, Unit 010 to allow for a new quarter glass side window for a new vehicle model.

(3) Two (2) Startup and Roll Test Lines. The second line was approved in 2014 for construction and approved in 2017 to increase utilization to accommodate 514,000 vehicles per year.

(4) One (1) vehicle testing operation for testing manufactured vehicle exhaust gas system while the vehicle remains stationary at the test equipment, with maximum throughput of 170 vehicles per year, constructed in 2018.

(5) Approved in 2016 to include chemical compound trans-1,3,3,3-tetrafluoropropene in the air conditioning refrigerant for use in vehicles assembled on Trim Lines A and B.

(j) Two (2) storage tanks and fluid filling operations, identified collectively as Unit 011, approved in 2014 to increase utilization to accommodate the increase in production capacity from 310,000 vehicles per year to 450,000 vehicles per year, and approved in 2017 to accommodate increase production to 514,000 vehicles per year, which includes the following equipment:

(1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 2018, using a certified vapor collection and control system;

(2) Windshield washer fluid storage tank, with a capacity of 15,000 gallons, constructed in 2018.

(3) Gasoline dispensing facility with a monthly gasoline throughput of ten thousand (10,000) gallons per month or greater.

(k) Purge Solvent usage and capture system, identified as Unit 012, constructed in 1989 and modified in 2006 and 2010, and approved in 2017 to increase utilization to accommodate vehicle production of 514,000 vehicles per year to allow for purging and capturing of solvent purge materials, approved in 2023 for modification to allow for additional purging of the interior robot e-stat painting process in unit 004, and approved in 2024 for modification to allow for additional spray gun purging in unit 003.

(1) One (1) storage tank, identified as purge solvent storage tank, approved in 2019 for construction, with a maximum capacity of 5,000 gallons.

(2) Waste solvent storage tank, with a capacity of 6,000 gallons, constructed in 1992.

(3) Purge solvent storage tank, with a capacity of 5,000 gallons, constructed in 2005.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

PERMIT SECTION D.7

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-4

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coatings/adhesives, amount of coatings/adhesives used, volume weighted average VOC content each month.		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

The source is reporting VOC emissions in compliance with the following permit limits.

	Permit Limit (per rolling 12-month period)
Plant A/B - Trim Line	
Unit 010 – Window install	0.40 lbs/gallon
Unit 010 – Non-window install	0.30 lbs/gallon

Gasoline dispensing was not observed during the inspection. Condition D.7.3 gives the option of having either a vehicle onboard fueling vapor recovery system or a system-wide vapor recovery system. The daily checks of the Stage II vapor recovery system are not required because all vehicles are equipped with onboard refueling vapor recovery systems (ORVR).

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.8

Emission Units and Control Devices:

Emissions Unit Description:

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) Natural gas-fired boilers

(A) Six (6) general hot water boilers with a combined heat input capacity of 19.6 MMBtu/hr. [326 IAC 2-2] [326 IAC 6-2-4]

(B) Three (3) natural gas fired boilers units, identified as B1-2015, B2-2015, and B3-2015, rated at 3.0 MMBtu/hr each, and 9.0 MMBtu/hr total installed in 2015.

(C) Boiler GWH1-01, rated at 0.3 MMBtu/hr, installed in 1999.

(D) Boiler GWH1-02, rated at 0.3 MMBtu/hr, installed in 1999.

(E) Three (3) natural gas-fired hot water boilers, identified as B1-2018, B2-2018 and B3-2018, each with a heat input capacity of 2.5 MMBtu/hour, constructed in 2018 to replace one (1) Temperature Control Boiler B10-01, rated at 4.184 MMBtu/hour, installed in 1989.

(F) One (1) natural gas-fired Temperature Control Boiler, identified as B1-01, with a heat input capacity of 1.67 MMBtu/hour, constructed in 2018 to replace one (1) Temperature Control Boiler B1-01 rated at 1.339 MMBtu/hour, installed in 1989.

(2) Other insignificant natural gas combustion units: [326 IAC 2-2]

(A) Stamping Shop Steam Cleaner

(B) Distillation Room Heater

(C) Makeup Air Units (7)

(D) Unit Heaters (50)

(E) Door Heaters (14)

(F) Air Handling Units (48)

(G) Heating and Ventilation Units (6)

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [326 IAC 2-2]

(1) One (1) Stamping Shop; (including new equipment installed in 2014 as part of the Expansion Project).

(2) Two (2) body lines within one (1) Body Shop with MIG and resistance welding robots, and one (1) grinding booth constructed in 1989 and approved for modification in 2012 to expand the Body Shop Building to include a Parts Storage Area and Body Shop Processing Area, including the following:

(A) One (1) natural gas-fired air supply unit, with a maximum heat input capacity of 1.73 million British thermal units per hour (MMBtu/hr).

PERMIT SECTION D.8

(B) MIG welding operations, with a maximum welding rod usage of 226,160 pounds per year, approved in 2017 to increase utilization to accommodate 514,000 vehicles per year.

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(d) Deburring; buffing; polishing; abrasive blasting activities; pneumatic conveying; and woodworking operations.

(e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, Methyl Tert-butyl Ether), approved in 2017 to increase utilization to accommodate 514,000 vehicles per year [326 IAC 2-2]

(2) The following storage tanks permitted under OP 79-09-93-0454, issued on July 26, 1989:

(A) One (1) double-walled fixed-roof engine oil storage tank, with a capacity of 5,000 gallons.

(B) One (1) double-walled fixed-roof power steering fluid storage tank, with a capacity of 5,000 gallons.

(3) Engine assembly and testing activities, originally permitted under E 157-14535-00050, issued on October 10, 2001, and subsequently modified as described:

(D) One (1) engine test bench, identified as ETB10, approved in 2017 for construction to accommodate 514,000 vehicles per year; and

(E) One natural gas-fired RTO (ENG-RTO) rated at 5.5 MMBtu/hr, permitted in 2017 for the control of emissions from engine test benches ETB 1 through ETB10 and the engine dynamometer.

(4) Manual solvent wipedown;

(5) One (1) power steering fluid storage tank, with a capacity of 5,000 gallons, installed in 1988.

(6) One (1) transmission oil storage tank, with a capacity of 5,000 gallons, installed in 1988.

(7) One (1) Antifreeze storage tank, with a capacity of 10,000 gallons, installed in 1988.

(8) One (1) Antifreeze storage tank, with a capacity of 12,000 gallons, installed in 1988.

(g) Seven (7) miscellaneous parts washers, consisting of the following:

(1) Two (2) parts washers for the Stamping Shop, constructed in 2017, one (1) with a capacity of 30 gallons and the other with a capacity of 10 gallons.

(2) One (1) parts washer for the WISI/Subaru, constructed in 2017, with a capacity of 10 gallons.

(3) Two (2) parts washers for the Engine Plant, constructed in 2017, one (1) with a capacity of 30 gallons and the other with a capacity of 10 gallons.

(4) One (1) parts washer for the Trim Maintenance Area, constructed in 2017, with a capacity of 30 gallons.

(5) One (1) parts washer for the Body Shop Area, constructed in 2017, with a capacity of 20 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

PERMIT SECTION D.8		
Pollutants with Emission Limits or Applicable Standards:		
☐ SO_2 ☒ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS		
Applicable Rules:		
• 326 IAC 2-2 • 326 IAC 6-2-4 • 326 IAC 8-3		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: degreasing solvent usage, vapor pressure		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Observations and Comments:		
No emission problems were observed from any of the listed Insignificant Activities.		
Permit Section Compliance Status:		
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐		

PERMIT SECTION D.9

Emission Units and Control Devices:

Entire Paint Coating Line System C- 2014 Project, approved in 2017 for Expansion, as described in Section D.10

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☒ NO_X ☐ CO ☒ VOC ☒ PM ☒ PM_{10} ☒ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: vehicle production, natural gas usage, VOC content of coating materials and solvents, amount of coating materials and solvents used		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

The surface coating operations at the facility consist of the following process. Like plant 1, the vehicle bodies are dip coated using electrodeposition to provide initial anticorrosion protection. Then the bodies go through a sealing step, which is a combination of robotic application and manual application for the finer detailed areas. Then the bodies are sprayed with a primer and a topcoat. These processes are all automated with robotic spray application systems.

Summary of the Emission Units and Control Equipment at the Facility			
		Control Equipment	
		VOC	**Particulate**
Plant C (Paint 2)			
Unit 013	Electrodeposition Coating		
Unit 014	Sealing and PVC Undercoating		Dry Filters
Unit 015	Intermediate Surfacer Coating		Water Wash System
Unit 016	Topcoat	Thermal Oxidizer (RTO-C1)	Water Wash System
Unit 017	Anticorrosion Coating		Dry Filters
Unit 019	Purge Solvent usage and capture		
Unit 020	Misc. Support Cleaning		

Again, just as in paint plant 1, the facility is using block painting whenever possible to minimize color changes and resulting use of purge solvents and all the robotic spray application systems have dedicated lines for each paint color that run from a centralized paint mix room to the spray nozzle. The only purging is during a color change and that is a very small amount in the tip of the spray nozzle.

A purge capture system is used each time that any coating application equipment is purged. The purge system is all enclosed. The robotic arm marries with the purge pot which encloses around the spray nozzle during cleaning and purging. Collected purge solvents are retained in a closed conveyance system to the solvent storage tank and in closed containers until such time as they are shipped offsite for disposal or recycling.

The facility follows the same training program as described in section D.1

The source is reporting VOC emissions in compliance with the following permit limits. The source wide (12 month rolling total) emissions calculations for VOC requires the control efficiency of each booth. This is only for those units that have control equipment (oxidizers) and is specified via stack testing. PM emissions required solids transfer

PERMIT SECTION D.9

efficiency of the applicators and overall PM control efficiency from manufacturing data. The facility is using 99.5% control efficiency from manufacturer data for their water wash systems and dry filters. Transfer efficiency is established via testing as specified above and using available data such as AP-42 for the remainder of lines. Transfer efficiency for electrodeposition is assumed at 100%.

	Permit Limit (per rolling 12-month period)
Source Wide – Plant C (New Expansion)	
Production totals	204,000 vehicles
Natural gas usage	751 MMcf
VOC emissions	582.5 tons
PM emissions	25 tons
PM10 emissions	15 tons
PM2.5 emissions	10 tons

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.10

Emission Units and Control Devices:

Emissions Unit Description:

(a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,000 vehicle per year venting to 10 exhaust stacks, identified as Stacks 13-1 through 13-10 consisting of the following units:

(1) One (1) Body Pretreatment Area

(A) Six (6) pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 7.8 MMBtu/hr, permitted in 2016 for construction.

(2) One (1) ED Coating System

(A) One (1) ED Coating Tank, utilizing dipping as the method of application.

(B) One (1) ED Oven, Unit 013, approved for construction in 2014, using no controls, approved in 2017 to extend its length, increase the conveyor speed, and increase total oven maximum heat input capacity to 13.55 MMBtu/hr.

(3) One (1) ED Body Cool Down Area

(4) One (1) ED Deck and ED Sand Area

(5) One (1) Paint Storage Room

(b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year venting to 5 exhaust stacks, identified as Stacks 14-1 through 14-5, consisting of the following:

(1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.

(2) One (1) Sealer Application Area, using no controls.

(3) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.

(4) One (1) PVC Sealer Oven, Unit 014, using no control, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, and increase oven maximum heat input capacity to 12.60 MMBtu/hr.

(5) One (1) PVC Cool Down Area, using no controls.

(c) Intermediate Surfacer Coating Line, identified as Unit 015, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year, venting to 15 exhaust stacks identified as Stacks 15-1 through 15-15, consisting of the following:

(1) Intermediate Coating Booth

(A) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.

(B) One (1) Intermediate (Surfacer) Air House rated at 26.5 MMBtu/hr permitted in 2016 for construction.

PERMIT SECTION D.10

(C) One (1) Intermediate (Surfacer) natural gas-fired Heated Flash-Off (HFO), permitted in 2017 for construction, approved in 2017 to replace the 2.5 MMBtu/hr Heated Flash-Off (HFO) with a Heated Flash-Off (HFO) rated at 6.4 MMBtu/hr.

(2) Intermediate Coating Oven

(A) One (1) Intermediate Coating Oven, with no VOC control, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, and add additional heat input capacity of 4.55 MMBtu/hr, for a total oven maximum heat input capacity of 14.65 MMBtu/hr.

(3) One (1) Intermediate Cool Down Area, using no controls.

(4) One (1) main paint mix room.

(d) Topcoat System #C1, identified as Unit 016, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year, venting to 27 exhaust stacks, identified as Stacks 16-1 through 16-27, consisting of the following:

(1) Topcoat #C1 Booth

(A) One (1) Topcoat #C1 Booth, utilizing the air atomization and electrostatic bell methods of spraying, using dry filtration or a water wash system to control the particulate overspray emissions.

(B) One (1) Topcoat #C1 natural gas-fired ASH unit rated at 42.0 MMBtu/hr, permitted in 2016 for construction.

(C) One (1) Topcoat #C1 natural gas-fired Heated Flash-Off (HFO) permitted in 2016 for construction, and approved in 2017 to replace the 2.5 MMBtu/hr heated flash-off (HFO) with a heated flash-off (HFO) rated at 6.4 MMBtu/hr.

(2) Topcoat #C1 Oven

(A) One (1) Topcoat #C1 Oven, Unit 016, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, and add additional heat input capacity for a total oven maximum heat input capacity of 12.15 MMBtu/hr. Approved in 2018 to replace its VOC control of 0.99 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) with a 2.5 MMBtu/hour RTO, identified as RTO-C1.

(3) One (1) Topcoat #C1 Cool Down Area, using no controls.

(4) One (1) main paint mix room.

(e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 257,000 units per year (built as part of existing paint lines A/B), approved in 2014 for construction, approved in 2017 to increase production from 225,000 to 257,000 vehicles per year, venting to 2 exhaust stacks, identified as Stacks 17-1 through 17-2, consisting of the following units:

(1) One (1) Black and Wax Coating Booth, which is part of existing paint lines A/B, equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions, approved in 2017 for physical and operational modifications to accommodate the increase in production from 225,000 to 257,000 vehicle per year.

(2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of 13.7 MMBtu/hr, permitted in 2016 for construction.

PERMIT SECTION D.10

(3) One (1) wax application line in the Trim & Final Assembly Area.

(f) Miscellaneous combustion devices, approved in 2016 for construction:

(1) One (1) Working Stage Air House #1 to support the Prep Deck and Offline Areas rated at 11.0 MMBtu/hr.

(2) One (1) Working Stage Air House #2 used to support the Inspection, Touch-up area rated at 11.0 MMBtu/hr.

(3) One (1) Paint Mixing Air House located in Mix Room rated at 2.0 MMBtu/hr.

(4) One (1) Working Stage Air House RFH to support the Surfacer Sand, Wet Sand #1 and #2, ED Sand, Sealer and PVC Area with no heating components.

(5) One (1) Working Stage Air House used to support Paint Coating Line C with no heating components.

(g) Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging of solvent purge materials and the capturing of solvent purge materials, approved in 2017 to increase utilization due to the increase in production from 160,000 to 204,000 vehicles per year.

(1) One (1) solvent purge material storage tank, with a capacity of 2,500 gallons, constructed in 2018.

(2) One (1) waste purge solvent storage tank, with a capacity of 2,500 gallons, constructed in 2018.

(h) Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials, approved in 2017 to increase utilization due to the increase in production from 160,000 to 204,000 vehicles per year.

Insignificant Activities:

(a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour

(3) Other insignificant natural gas combustion units approved in 2014 and 2016 for construction: [326 IAC 2-2]

(A) Rooftop Units -
- Engine Assembly Expansion - 4 Units (1.6 MMBtu/hr total)
- Engine Warehouse Expansion - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 1 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 2 - 7 Units (2.8 MMBtu/hr total)
- Trim Warehouse Phase 3 - 7 Units (2.8 MMBtu/hr total)
- Stamping Warehouse 1 - 4 Units (1.6 MMBtu/hr total)
- Motor Pool Bldg. - 5 Units (2.0 MMBtu/hr total)
- Paint Coating Line C Heating and Cooling Units - 10 units (7.4 MMBtu/hr total)
- Paint Coating Line C Makeup Air Heating Units - 5 units (8.1 MMBtu/hr total)
- Paint Coating Line C Air Handling Units - 2 units (8.3 MMBtu/hr total)

(B) Heater Units -
- Engine Warehouse Expansion - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 1 - 3 Units (1.2 MMBtu/hr total)
- Trim Warehouse Phase 2 - 3 Units (1.2 MMBtu/hr total)
- Trim Warehouse Phase 3 - 4 Units (1.6 MMBtu/hr total)
- Motor Pool Accessary Bldg - 2 Units (0.8 MMBtu/hr total)

PERMIT SECTION D.10

- Paint Coating Line C Heater Units - 17 units (6.8 MMBtu/hr total)

(C) Natural Gas-Fired Boiler:
One (1) spray booth boiler comprised of six (6) units with a maximum heat input rate of 1.25 MMBtu/hr each and a total maximum heat input rate of 7.5 MMBtu/hr.

(D) Emergency Equipment:
(1) One (1) natural gas-fired emergency generator with a maximum heat input capacity of 4.8 MMBtu/hr (rated at 636 HP), permitted in 2016 for construction.

(E) General Heating Units:

(1) Three (3) makeup air units (MAU) heating units for Paint Shop Coating Line C Building, with a total maximum heat input capacity of 7.25 MMBtu/hr, approved in 2017 for construction.

(2) Four (4) air heaters for Paint Shop Coating Line C Building, with a total maximum heat input capacity of 2.39 MMBtu/hr, approved in 2017 for construction.

(3) Four (4) MAU heating units for die storage building, with a total maximum heat input capacity of 6.24 MMBtu/hr, approved in 2017 for construction.

(4) Four (4) air heaters for die storage building, with a total maximum heat input capacity of 2.08 MMBtu/hr, approved in 2017 for construction.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 2-2
- 326 IAC 8-2-2
- 326 IAC 8-1-2
- 326 IAC 8-2-9
- 326 IAC 6-2-4
- 326 IAC 6-3-2

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount of coating materials and solvents used, volume weighted average VOC content, temperature 3-hr avg on RTO, duct pressure or fan amperage, Operator training program records, water wash system records (daily inspections), dry filter inspection and replacement		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No

Observations and Comments:

The new paint line expansion, Paint Coating Line System C, was not observed during the inspection.

The facility provided historical logs to document that they were conducting daily (per shift) visual inspections of the water wash flood pans, water circulation, and warning system on the circulation pump on the following coating booths.

Plant 2 - Intermediate Surfacer (Unit 015)
Topcoat Booth (Unit 016)

The semiannual assessment of overspray from exhaust stacks for the Intermediate Surfacer (15-1 through 15-14) and the Topcoat Booth (16-1 through 16-26) are no longer required by the permit.

Dry filters are required to be in place for particulate control in the Sealing / PVC undercoating booths and the Black Coat / Wax booths in plant 1 and 2. Weekly pressure drop monitoring and monthly filter change records were reviewed.

Plant 2 - PVC Coating booth (Unit 014)
Black and Wax Coating booth (Unit 017)

On all their oxidizers the facility is continuously monitoring and recording the operating temperature every minute and translates that to a 3-hour average for historical review. The facility is also monitoring fan amperage on their oxidizers on a daily basis.

Thermal Oxidizer / Catalytic Incinerator		Recorded on Date of Inspection		Minimum established at most recent stack testing	
		Temperature (3-hr avg)	Duct Pressure / Fan Amperage	Temperature	Duct Pressure / Fan Amperage
Unit 016	Topcoat (RTO-C1)	1587 °F	44.4 amps	1562 °F	44.3 amps

The control logic for the VOC emission control devices (thermal oxidizers and catalytic incinerators) is set up such that when the temperature reaches a predetermined lower limit an alarm makes that known to the operator who then takes corrective action. The lower limits for temperature on all control devices is at the minimum temperature established at the most recent stack testing.

	Set Point	Lower Limit
Unit 016 – Topcoat (RTO-C1)	1586 °F	1562 °F

Stack testing was conducted on November 1, 2023, as summarized in the chart below to demonstrate compliance with the VOC destruction efficiency, which is permitted at a minimum of 95%. The minimum 3-hour average operating temperature and fan amperage or duct pressure were also established during stack testing and is summarized in an earlier chart.
The capture and transfer efficiency testing information are used to calculate the daily VOC emissions per permitted equations.

STACK TESTING Thermal Oxidizer / Catalytic Incinerator		Transfer Efficiency	VOC control efficiency		
			Capture	Destruction	
		Measured during stack testing			Permitted minimum
Unit 016	Topcoat Oven (TO-C1)	77.3%	100%	98.5%	95%

The source is reporting VOC emissions in compliance with the following permit limits. The VOC content for each emission unit is specifically calculated as a daily average and takes into account the transfer efficiency of the applicators and control efficiency of oxidizers in the calculations for those units with control equipment. Most of the paints are already compliant coatings with only a few colors that are noncompliant and thus triggering the need for daily weighted averaging.

	Permit Limit (per rolling 12-month period)
Plant C (New Expansion)	
Paint Line - Electrodeposition and Topcoat	
Unit 013 – ED Coating Line	1.15 lbs/gallon
Unit 014 – Sealer, LASD, Undercoating	0.38 lbs/gallon
Unit 015 – Intermediate Surfacer	4.8 lbs/gallon
Unit 016 – Topcoat	10.96 lbs/gallon
Sealing / PVC Undercoating and Black / Wax	
Unit 017 – Black/Wax (phthalic black)	1.0 lbs/gallon
Unit 017 – Black/Wax (inner wax)	3.5 lbs/gallon
Unit 019 – Paint line purge solvent minus capture system	83.8 tons
Unit 020 – Wiping and clean up solvents	15.2 tons

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION D.11

Emission Units and Control Devices:

Emissions Unit Description:

(i) One (1) Electrodeposition (ED) coating line with supporting multi-stage cleaning process equipment, identified as Unit 101, approved in 2020 for construction, with a material combined usage rate (excluding water) of 81,000 gallons per year, using no control, and exhausting through supporting stack(s). This coating line consists of the following:

(1) One (1) natural gas-fired pretreatment boiler, with a heat input capacity of 7.5 MMBtu per hour.

(2) One (1) ED natural gas-fired curing oven, consisting of multiple burners, with a total heat input capacity of 7.0 MMBtu per hour.

(j) One (1) sealer line, identified as Unit 102, using manual application, approved in 2020 for construction, with a material usage rate of 45,000 gallons per year, using no control, and exhausting through supporting stack(s). This sealer line consists of one (1) natural gas-fired oven, consisting of multiple burners, with a total heat input capacity of 2.5 MMBtu per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☒ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rules:

- 326 IAC 8-2-2
- 326 IAC 8-2-9
- 326 IAC 6-2-4

Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Determination Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Recordkeeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: VOC content of coating materials and solvents, amount of coating materials and solvents used, volume weighted average VOC content each day		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

The Electrodeposition (ED) coating line Unit 101 and Sealer Line Unit 102 were not observed during the inspection.

Usage records/emission calculations indicate compliance with the ED coating line daily VOC emissions limit of 1.9 lbs/gallon (less water), and with the Sealer Line VOC content limit of 3.5 lbs/gallon (less water).

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

Emission Units and Control Devices:

Emissions Unit Description:

Paint Coating Line Systems A/B:

(a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:

(1) One (1) Body Pretreatment area.

(A) One (1) Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 2.5 MMBtu/hr.

(B) Six (6) insignificant pretreatment boilers, with a total heat input capacity of 9.0 MMBtu/hr.

(2) One (1) ED Coating System

(A) One (1) ED Coating Tank, utilizing dipping as the method of application.

(B) One (1) ED Body Oven, with two (2) direct fired and three (3) indirect fired natural gas burners (oven zones #1 through #5) each with a heat input capacity of 2.5 MMBtu/hr, using a 3.0 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control , and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust).

(C) One (1) ED Body Cool Down area

(D) One (1) ED paint storage room.

(b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 77 units per hour, constructed in 1989 and approved for modification in 2012, consisting of the following units:

(1) PVC Coating Booths

(A) One (1) PVC Coating Booth #1, constructed in 1989, utilizing a combination of manual and automated airless spray application systems, using a dry filter as particulate matter control, approved in 2012 for modification to add additional spray coating application systems, and exhausting to one (1) stack, identified as PVC-1-2.

(B) One (1) PVC Coating Booth #2, constructed in 1999 and modified in 2006, utilizing the airless spray method of application, using a dry filter as particulate control, approved in 2012 for modification to add additional spray coating application systems and exhausting to one (1) stack, identified as PVC-Booth 2.

(C) One (1) direct fired natural gas Air Supply House (ASH) unit supplying air to PVC Coating Booth #1 & #2, with a heat input capacity of 16.8 MMBtu/hr.

(2) PVC Coating Oven

(A) One (1) PVC Coating Oven with two (2) direct fired natural gas burners (oven zones #1 and #2), each with a heat input capacity of 2.5 MMBtu/hr.

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

(3) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling.

(4) One (1) Sound Deadener Operation approved in 2010 for construction, using no controls.

(c) Topcoat System, identified as Unit 003, constructed in 1989, modified in 2006, 2008, 2009, 2010, 2013, 2016, and approved in 2024 for modification, consisting of the following units:

(1) Topcoat #1 (B) Booth

(A) One (1) Topcoat #1 (B) Booth, approved in 2024 to replace existing spray applicators with automated electrostatic bell type spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10.

(B) Three (3) Topcoat #1 (B) Booth direct fired natural gas ASH units (ASH #1, #2, and #3), each with a 21.6 MMBtu/hr pre-heat burner and 8.4 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones with one (1) indirect fired natural gas burner, with a heat input capacity of 3.2 MMBtu/hr.

(2) Topcoat #1 (B) Oven

(A) One (1) (B) Topcoat #1 Oven, approved in 2013 for modification, with three (3) direct fired natural gas burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #1 (B) Oven are not controlled and exhaust to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas auxiliary heater with a heat input capacity of 2.5 MMBtu/hr.

(3) One (1) Topcoat #1 (B) Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.

(4) Topcoat #2 (A) Booth

(A) One (1) Topcoat #2 (A) Booth, approved in 2016 for modification to replace existing spray applicators with automated electrostatic bell type spray applicators, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10.

(B) Three (3) Topcoat #2 (A) Booth direct fired natural gas ASH units (ASH #1, #2, and #3), each with a 40.8 MMBtu/hr pre-heat burner and 2.3 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones, with one (1) indirect fired natural gas burner, with a heat input capacity of 3.5 MMBtu/hr.

(5) Topcoat #2 (A) Oven

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

(A) One (1) Topcoat #2 (A) Oven, approved in 2013 for modification, with three (3) direct fired natural gas burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #2 (A) Oven are not controlled and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas auxiliary heater with a heat input capacity of 2.5 MMBtu/hr.

(6) One (1) Topcoat #2 (A) Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2.

(7) Topcoat #3 (C) Booth

(A) One (1) Topcoat #3 (C) Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5.

(B) Two (2) Topcoat #3 (C) Booth direct fired natural gas ASH units (ASH #1, and #2), each with a 24.5 MMBtu/hr pre-heat burner and 1.8 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones, with one (1) indirect fired natural gas burner, with a heat input capacity of 1.6 MMBtu/hr.

(8) Topcoat #3 (C) Oven

(A) One (1) Topcoat #3 (C) Oven, approved in 2013 for modification, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 2.5 MMBtu/hr and two (2) each with a heat input capacity of 1.5 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #3 (C) Oven are not controlled and exhaust to one (1) stack, identified as TC-3 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas flash-off between the basecoat and clearcoat zones, with a heat input capacity of 1.6 MMBtu/hr.

(9) One (1) Topcoat #3 **(C)** Cool Down area, using no controls.

(10) Paint 1 main mix room.

(d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations, approved in 2023 for modification to replace two (2) manual air-assisted spray guns with interior robot e-stat painting process, consisting of the following units:

(1) Intermediate Coating Booth

(A) One (1) Intermediate Coating Booth, utilizing, two (2) robots, for the application of anti-chip (ACC), the interior robot e-stat painting process, followed by the exterior

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7.

(B) Two (2) Intermediate Coating Booth direct fired natural gas ASH units (ASH #1 and #2), each with a 29.9 MMBtu/hr pre-heat burner and 8.2 MMBtu/hr reheat burner.

(2) Intermediate Coating Oven

(A) One (1) Intermediate Coating Oven with one (1) indirect fired and four (4) direct fired natural burners (oven zones #1, #2, #2B, #3, and #4), each with a heat input capacity of 2.5 MMBtu/hr, using a 1.5 MMBtu/hr natural gas-fired catalytic incinerator as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust).

(3) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.

(4) Paint 1 main mix room

(e) Plastic Bumper Coating Line A (PBL-A), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, modified in 2010, and approved in 2017 to allow balancing of the plant's two plastic bumper coating lines (Unit 005 and Unit 005B) to support the production of 257,000 vehicles per year on each line, consisting of the following units:

(1) PBL-A Paint Booth

(A) One (1) PBL-A Paint Booth, utilizing the air atomization and electrostatic bell methods of spraying, using a water wash as particulate matter control, and exhausting to four (4) stacks, identified as BPR-1, BPR-2, BPR-JR, and BPR-AP.

(B) One (1) PBL-A Paint Booth direct fired natural gas ASH unit, with a 30 MMBtu/hr pre-heat burner and 6 MMBtu/hr reheat burner.

(C) Two (2) Heated Flash-Offs (HFOs) between the basecoat and clearcoat zones, each with one (1) indirect fired natural gas burner, with a heat input capacity of 0.8 MMBtu/hr.

(2) PBL-A Paint Oven

(A) One (1) PBL-A Paint Oven with two (2) direct fired natural gas burners (oven zones #2 and #3), each with a heat input capacity of 1.6 MMBtu/hr, using a 2.24 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR-Inc.

(3) One (1) PBL-A Cool Down area.

(4) One (1) paint mixing room.

(f) Anticorrosion Coating, identified as Unit 006, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to add two (2) spray coating systems at the Black Coat & Wax Booth to allow more vehicles coated hourly, including the following equipment:

(1) Black & Wax and Anticorrosion Coating Booths

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

(A) One (1) Black & Wax Booth, utilizing the air atomized and air-assisted airless methods of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack.

(B) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate control, exhausting to Anticorrosion Stack.

(C) One (1) direct fired natural gas ASH unit supplying air to the Black & Wax and Anticorrosion Coating booths, with a heat input capacity of 27.6 MMBtu/hr.

(g) Plastic Bumper Coating Line B (PBL-B) identified as Unit 005B, constructed in 2006, approved in 2014 for physical modification and operational change as part of the "2014 Increase in Capacity Project" for the plastic bumper coating operations of Subaru vehicles. This project involves an increase in capacity from 110,000 to 250,000 vehicles per year, and approved in 2017 to allow balancing of the plant's two plastic bumper coating lines (Unit 005 and Unit 005B) to support the production of 257,000 vehicles per year on each line, consisting of the following:

(1) PBL-B Paint Booth

(A) One (1) primer spray zone in Unit 005B booth, with robotic spray applicators utilizing bell application techniques as approved in 2014 with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(a).

(B) One (1) basecoat spray zone, with robotic spray applicators utilizing bell application techniques as approved in 2014, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(b).

(C) One (1) clearcoat spray zone, with robotic spray applicators utilizing bell application techniques as approved in 2014, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(c).

(D) One (1) PBL-B Paint Booth direct fired natural gas ASH unit, with a 32 MMBtu/hr pre-heat burner and 2.72 MMBtu/hr reheat burner.

(E) Two (2) Heated Flash-Offs (HFOs) between the basecoat and clearcoat zones, each with one (1) direct fired natural gas burner, with a heat input capacity of 1.5 MMBtu/hr.

(F) Six (6) back-up manual spray applicators approved in 2014 for construction.

(2) PBL-B Paint Oven

(A) One (1) PBL-B Paint Oven with three (3) indirect fired natural gas burners (oven zones #1, #2 and #3), with a heat input capacity of 1.5 MMBtu/hr, 2.5 MMBtu/hr, and 1.6 MMBtu/hr, exhausting to one (1) stack, identified as PB2(g). Approved in 2014 to increase oven length and add the 1.6 MMBtu/hr burner.

(3) One (1) PBL-B Cool Down area.

(4) One (1) paint mixing room.

(h) Final Repair (Touchup) painting, identified as Unit 007, constructed in 1989 and approved in 2014 to increase capacity from 10 units per hour to 15 units per hour, approved in 2016 to increase utilization to accommodate 514,000 vehicles per year including the following equipment:

(1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying.

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

(i) Trim Line, identified as Unit 010, application in the Body Shop and Trim Shop of adhesives and sealers to various vehicle parts, constructed in 1989, approved in 2012 for modification which includes increasing the line speed to allow more vehicles to be coated on an hourly basis, approved in 2014 for modification in order to accommodate a production increase from 310,000 vehicles per year to 450,000 vehicles per year, and approved in 2017 for physical modification to increase conveyor speed to allow for an increase in vehicle production from 450,000 to 514,000 vehicles per year:

(1) One (1) Trim Wax application line.

(2) Robotic applicators, permitted in 2016 for construction in the window installation area of Trim Line B, Unit 010 to allow for a new quarter glass side window for a new vehicle model.

(3) Two (2) Startup and Roll Test Lines. The second line was approved in 2014 for construction and approved in 2017 to increase utilization to accommodate 514,000 vehicles per year.

(4) One (1) vehicle testing operation for testing manufactured vehicle exhaust gas system while the vehicle remains stationary at the test equipment, with maximum throughput of 170 vehicles per year, constructed in 2018.

(6) Approved in 2016 to include chemical compound trans-1,3,3,3- tetrafluoropropene in the air conditioning refrigerant for use in vehicles assembled on Trim Lines A and B.

(j) Two (2) storage tanks and fluid filling operations, identified collectively as Unit 011, approved in 2014 to increase utilization to accommodate the increase in production capacity from 310,000 vehicles per year to 450,000 vehicles per year, and approved in 2017 to accommodate increase production to 514,000 vehicles per year, which includes the following equipment:

(1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 2018, using a certified vapor collection and control system.

(2) Windshield washer fluid storage tank, with a capacity of 15,000 gallons, constructed in 2018.

(3) Gasoline dispensing facility with a monthly gasoline throughput of ten thousand (10,000) gallons per month or greater.

(k) Purge Solvent usage and capture system, identified as Unit 012, constructed in 1989 and modified in 2006 and 2010, and approved in 2017 to increase utilization to accommodate vehicle production of 514,000 vehicles per year to allow for purging and capturing of solvent purge materials**,** approved in 2023 for modification to allow for additional purging of the interior robot e-stat painting process in unit 004, and approved in 2024 for modification to allow for additional spray gun purging in unit 003.

(1) One (1) storage tank, identified as purge solvent storage tank, approved in 2019 for construction*,* with a maximum capacity of 5,000 gallons.

(2) Waste solvent storage tank, with a capacity of 6,000 gallons, constructed in 1992.

(3) Purge solvent storage tank, with a capacity of 5,000 gallons, constructed in 2005.

(l) One (1) working stage direct fired natural gas ASH unit with a heat input capacity of 21.6 MMBtu/hr

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

Paint Coating Line System C, with a maximum capacity of 160,000 vehicles per year, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,000 vehicle per year, consisting of the following units:

(a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,000 vehicle per year venting to 10 exhaust stacks, identified as Stacks 13-1 through 13-10 consisting of the following units:

(1) One (1) Body Pretreatment Area

(A) Six (6) pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 7.8 MMBtu/hr, permitted in 2016 for construction.

(2) One (1) ED Coating System

(A) One (1) ED Coating Tank, utilizing dipping as the method of application.

(B) One (1) ED Oven, Unit 013, approved for construction in 2014, using no controls, approved in 2017 to extend its length, increase the conveyor speed, and increase total oven maximum heat input capacity to 13.55 MMBtu/hr.

(3) One (1) ED Body Cool Down Area

(4) One (1) ED Deck and ED Sand Area

(5) One (1) Paint Storage Room

(b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year venting to 5 exhaust stacks, identified as Stacks 14-1 through 14-5, consisting of the following:

(1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.

(2) One (1) Sealer Application Area, using no controls.

(3) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.

(4) One (1) PVC Sealer Oven, Unit 014, using no control, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, and increase oven maximum heat input capacity to 12.60 MMBtu/hr.

(5) One (1) PVC Cool Down Area, using no controls.

(c) Intermediate Surfacer Coating Line, identified as Unit 015, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year, venting to 15 exhaust stacks identified as Stacks 15-1 through 15-15, consisting of the following:

(1) Intermediate Coating Booth

(A) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

(B) One (1) Intermediate (Surfacer) Air House rated at 26.5 MMBtu/hr permitted in 2016 for construction.

(C) One (1) Intermediate (Surfacer) natural gas-fired Heated Flash-Off (HFO), permitted in 2017 for construction, approved in 2017 to replace the 2.5 MMBtu/hr Heated Flash-Off (HFO) with a Heated Flash-Off (HFO) rated at 6.4 MMBtu/hr.

(2) Intermediate Coating Oven

(A) One (1) Intermediate Coating Oven, with no VOC control, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, add additional heat input capacity of 4.55 MMBtu/hr, for a total oven maximum heat input capacity of 14.65 MMBtu/hr.

(3) One (1) Intermediate Cool Down Area, using no controls.

(4) One (1) main paint mix room.

(d) Topcoat System #C1, identified as Unit 016, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year, venting to 27 exhaust stacks, identified as Stacks 16-1 through 16-27, consisting of the following:

(1) Topcoat #C1 Booth

(A) One (1) Topcoat #C1 Booth, utilizing the air atomization and electrostatic bell methods of spraying, using dry filtration or a water wash system to control the particulate overspray emissions.

(B) One (1) Topcoat #C1 natural gas-fired ASH unit rated at 42.0 MMBtu/hr, permitted in 2016 for construction.

(C) One (1) Topcoat #C1 natural gas-fired Heated Flash-Off (HFO) permitted in 2016 for construction, and approved in 2017 to replace the 2.5 MMBtu/hr heated flash-off (HFO) with a heated flash-off (HFO) rated at 6.4 MMBtu/hr.

(2) Topcoat #C1 Oven

(A) One (1) Topcoat #C1 Oven, Unit 016, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, and add additional heat input capacity for a total oven maximum heat input capacity of 12.15 MMBtu/hr. Approved in 2018 to replace its VOC control of 0.99 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) with a 2.5 MMBtu/hour RTO, identified as RTO-C1.

(3) One (1) Topcoat #C1 Cool Down Area, using no controls.

(4) One (1) main paint mix room.

(e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 257,000 units per year (built as part of existing paint lines A/B), approved in 2014 for construction, approved in 2017 to increase production from 225,000 to 257,000 vehicles per year, venting to 2 exhaust stacks, identified as Stacks 17-1 through 17-2, consisting of the following units:

(1) One (1) Black and Wax Coating Booth, which is part of existing paint lines A/B, equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

overspray emissions, approved in 2017 for physical and operational modifications to accommodate the increase in production from 225,000 to 257,000 vehicle per year.

(2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of 13.7 MMBtu/hr, permitted in 2016 for construction.

(3) One (1) wax application line in the Trim & Final Assembly Area.

(f) Miscellaneous combustion devices, approved in 2016 for construction:

(1) One (1) Working Stage Air House #1 to support the Prep Deck and Offline Areas rated at 11.0 MMBtu/hr, permitted in 2016 for construction.

(2) One (1) Working Stage Air House #2 used to support the Inspection, Touch-up area rated at 11.0 MMBtu/hr.

(3) One (1) Paint Mixing Air House located in Mix Room rated at 2.0 MMBtu/hr.

(4) One (1) Working Stage Air House RFH to support the Surfacer Sand, Wet Sand #1 and #2, ED Sand, Sealer and PVC Area with no heating components.

(5) One (1) Working Stage Air House used to support Paint Coating Line C with no heating components.

(g) Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging of solvent purge materials and the capturing of solvent purge materials, approved in 2017 to increase utilization due to the increase in production from 160,000 to 204,000 vehicles per year.

(1) One (1) purge solvent material storage tank, with a capacity of 2,500 gallons, constructed in 2018.

(2) One (1) waste purge solvent storage tank, with a capacity of 2,500 gallons, constructed in 2018.

(h) Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials, approved in 2017 to increase utilization due to the increase in production from 160,000 to 204,000 vehicles per year.

(i) One (1) Electrodeposition (ED) coating line with supporting multi-stage cleaning process equipment, identified as Unit 101, approved in 2020 for construction, with a material combined usage rate (excluding water) of 81,000 gallons per year, using no control, and exhausting through supporting stack(s). This coating line consists of the following:

(1) One (1) natural gas-fired pretreatment boiler, with a heat input capacity of 7.5 MMBtu per hour.

(2) One (1) ED natural gas-fired curing oven, consisting of multiple burners, with a total heat input capacity of 7.0 MMBtu per hour.

(j) One (1) sealer line, identified as Unit 102, using manual application, approved in 2020 for construction, with a material usage rate of 45,000 gallons per year, using no control, and exhausting through supporting stack(s). This sealer line consists of one (1) natural gas-fired oven, consisting of multiple burners, with a total heat input capacity of 2.5 MMBtu per hour.

PERMIT SECTION E.1 NESHAP - 40 CFR 63, Subpart IIII

(Surface Coating of Automobiles and Light-Duty Trucks)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

National Emission Standards for Hazardous Air Pollutants (NESHAP): Automobiles and Light-Duty Trucks [40 CFR Part 63, Subpart IIII]

Applicability Information:

63.3082 - The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of new automobile or new light-duty truck bodies, or body parts for new automobiles or new light-duty trucks.

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: usage records/calculations used to determine the organic HAP emission rates, NESHAP Subpart IIII -Semiannual Compliance Reports, oxidizer temperature, work practice standards		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

Compliance with NESHAP Subpart PPPP and MMMM are accomplished by virtue of compliance with NESHAP for automobile and light-duty trucks Subpart IIII by limiting HAP emissions.

Because electrodeposition coatings meet the requirements of 63.3092(a) [ED material contain no more than 1.0% by wt. of any organic HAP or 0.10% by wt. of any organic HAP which is an OSHA defined carcinogen] compliance is achieved in accordance with 40 CFR 63.3091(b) by limiting combined organic HAP emissions to the atmosphere from affected coatings to no more than 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in §63.3171, and grouped into two separate paint lines, A/B and C. Average Organic HAP emissions from all deadeners, and all adhesives/sealers (other than glass bonding materials) are limited to 0.010 lb/lb of material used and are included as single plantwide grouping.

No deviations of the emission limits or work practices were observed.

And there were no deviations of the Continuous Parameter Monitoring System (CPMS) for temperature on the oxidizers in the Paint #1 and Paint #2 operations. See sections D.4 and D.10 for details.

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

SECTION E.2 NSPS - 40 CFR Part 60, Subpart MM

(Automobile and Light Duty Truck Surface Coating Operation)

Emission Units and Control Devices:

Emissions Unit Description:

(a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:

(1) One (1) Body Pretreatment area.

(A) One (1) Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 2.5 MMBtu/hr.

(B) Six (6) insignificant pretreatment boilers, with a total heat input capacity of 9.0 MMBtu/hr**.**

(2) One (1) ED Coating System

(A) One (1) ED Coating Tank, utilizing dipping as the method of application.

(B) One (1) ED Body Oven, with two (2) direct fired and three (3) indirect fired natural gas burners (oven zones #1 through #5) each with a heat input capacity of 2.5 MMBtu/hr, using a 3.0 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control , and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust.

(C) One (1) ED Body Cool Down area

(D) One (1) ED paint storage room.

(c) Topcoat System, identified as Unit 003, constructed in 1989, modified in 2006, 2008, 2009, 2010**,** 2013, 2016, and approved in 2024 for modification, consisting of the following units:

(1) Topcoat #1 (B) Booth

(A) One (1) Topcoat #1 (B) Booth, approved in 2024 to replace existing spray applicators with automated electrostatic bell type spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10.

(B) Three (3) Topcoat #1 (B) Booth direct fired natural gas ASH units (ASH #1, #2, and #3), each with a 21.6 MMBtu/hr pre-heat burner and 8.4 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones with one (1) indirect fired natural gas burner, with a heat input capacity of 3.2 MMBtu/hr.

(2) Topcoat #1 (B) Oven

(A) One (1) (B) Topcoat #1 Oven, approved in 2013 for modification, with three (3) direct fired natural gas burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #1 (B) Oven are not controlled and exhaust

SECTION E.2 NSPS - 40 CFR Part 60, Subpart MM

(Automobile and Light Duty Truck Surface Coating Operation)

to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas auxiliary heater with a heat input capacity of 2.5 MMBtu/hr.

(3) One (1) Topcoat #1 (B) Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.

(4) Topcoat #2 (A) Booth

(A) One (1) Topcoat #2 (A) Booth, approved in 2016 for modification to replace existing spray applicators with automated electrostatic bell type spray applicators, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10.

(B) Three (3) Topcoat #2 (A) Booth direct fired natural gas ASH units (ASH #1, #2, and #3), each with a 40.8 MMBtu/hr pre-heat burner and 2.3 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-Off (HFO) between the basecoat and clearcoat zones, with one (1) indirect fired natural gas burner, with a heat input capacity of 3.5 MMBtu/hr.

(5) Topcoat #2 (A) Oven

(A) One (1) Topcoat #2 (A) Oven, approved in 2013 for modification, with three (3) direct fired natural gas burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #2 (A) Oven are not controlled and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas auxiliary heater with a heat input capacity of 2.5 MMBtu/hr.

(6) One (1) Topcoat #2 (A) Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2.

(7) Topcoat #3 (C) Booth

(A) One (1) Topcoat #3 (C) Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5.

(B) Two (2) Topcoat #3 (C) Booth direct fired natural gas ASH units (ASH #1, and #2), each with a 24.5 MMBtu/hr pre-heat burner and 1.8 MMBtu/hr reheat burner.

(C) One (1) Heated Flash-off (HFO) between the basecoat and clearcoat zones, with one (1) indirect fired natural gas burner, with a heat input capacity of 1.6 MMBtu/hr.

(8) Topcoat #3 (C) Oven

SECTION E.2 NSPS - 40 CFR Part 60, Subpart MM

(Automobile and Light Duty Truck Surface Coating Operation)

(A) One (1) Topcoat #3 (C) Oven, approved in 2013 for modification, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 2.5 MMBtu/hr and two (2) each with a heat input capacity of 1.5 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer as VOC control, and exhausting to one (1) stack, identified as RTO-TC123. (emissions from the entrance to and exit from the Topcoat #3 (C) Oven are not controlled and exhaust to one (1) stack, identified as TC-3 Ex.). The oven is equipped with a purge exhaust stack.

(B) One (1) indirect fired natural gas flash-off heater between the basecoat and clearcoat zones, with a heat input capacity of 1.6 MMBtu/hr.

(9) One (1) Topcoat #3 **(C)** Cool Down area, using no controls.

(10) Paint 1 main mix room.

(d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations, approved in 2023 for modification to replace two (2) manual air-assisted spray guns with interior robot e-stat painting process**,** consisting of the following units:

(1) Intermediate Coating Booth

(A) One (1) Intermediate Coating Booth, utilizing, two (2) robots, for the application of anti-chip (ACC), the interior robot e-stat painting process, followed by the exterior robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7.

(B) Two (2) Intermediate Coating Booth direct fired natural gas ASH units (ASH #1 and #2), each with a 29.9 MMBtu/hr pre-heat burner and 8.2 MMBtu/hr reheat burner.

(2) Intermediate Coating Oven

(A) One (1) Intermediate Coating Oven with one (1) indirect fired and four (4) direct fired natural burners (oven zones #1, #2, #2B, #3, and #4), each with a heat input capacity of 2.5 MMBtu/hr, using a 1.5 MMBtu/hr natural gas-fired catalytic incinerator as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust).

(3) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.

(4) Paint 1 main mix room

Paint Coating Line System C

(a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,000 vehicle per year venting to 10 exhaust stacks, identified as Stacks 13-1 through 13-10 consisting of the following units:

(1) One (1) Body Pretreatment Area

SECTION E.2 NSPS - 40 CFR Part 60, Subpart MM

(Automobile and Light Duty Truck Surface Coating Operation)

(A) Six (6) pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 7.8 MMBtu/hr, permitted in 2016 for construction.

(2) One (1) ED Coating System

(A) One (1) ED Coating Tank, utilizing dipping as the method of application.

(B) One (1) ED Oven, Unit 013, approved for construction in 2014, using no controls, approved in 2017 to extend its length, increase the conveyor speed, and increase total oven maximum heat input capacity to 13.55 MMBtu/hr.

(3) One (1) ED Body Cool Down Area

(4) One (1) ED Deck and ED Sand Area

(5) One (1) Paint Storage Room

(b) Intermediate Surfacer Coating Line, identified as Unit 015, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year, venting to 15 exhaust stacks identified as Stacks 15-1 through 15-15, consisting of the following:

(1) Intermediate Coating Booth

(A) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.

(B) One (1) Intermediate (Surfacer) Air House rated at 26.5 MMBtu/hr permitted in 2016 for construction.

(C) One (1) Intermediate (Surfacer) natural gas-fired Heated Flash-Off (HFO), permitted in 2017 for construction, approved in 2017 to replace the 2.5 MMBtu/hr Heated Flash-Off (HFO) with a Heated Flash-Off (HFO) rated at 6.4 MMBtu/hr.

(2) Intermediate Coating Oven

(A) One (1) Intermediate Coating Oven, with no VOC control, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, add additional heat input capacity of 4.55 MMBtu/hr, for a total oven maximum heat input capacity of 14.65 MMBtu/hr.

(3) One (1) Intermediate Cool Down Area, using no controls.

(4) One (1) main paint mix room.

(c) Topcoat System #C1, identified as Unit 016, approved in 2014 for construction, approved in 2017 to increase production from 160,000 to 204,0000 vehicle per year, venting to 27 exhaust stacks, identified as Stacks 16-1 through 16-27, consisting of the following:

(1) Topcoat #C1 Booth

(A) One (1) Topcoat #C1 Booth, utilizing the air atomization and electrostatic bell methods of spraying, using dry filtration or a water wash system to control the particulate overspray emissions.

SECTION E.2 NSPS - 40 CFR Part 60, Subpart MM

(Automobile and Light Duty Truck Surface Coating Operation)

(B) One (1) Topcoat #C1 natural gas-fired ASH unit rated at 42.0 MMBtu/hr, permitted in 2016 for construction.

(C) One (1) Topcoat #C1 natural gas-fired Heated Flash-Off (HFO) permitted in 2016 for construction, and approved in 2017 to replace the 2.5 MMBtu/hr heated flash-off (HFO) with a heated flash-off (HFO) rated at 6.4 MMBtu/hr.

(2) Topcoat #C1 Oven

(A) One (1) Topcoat #C1 Oven, Unit 016, permitted in 2016 for construction, approved in 2017 to extend its length, increase the conveyor speed, and add additional heat input capacity for a total oven maximum heat input capacity of 12.15 MMBtu/hr. Approved in 2018 to replace its VOC control of 0.99 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) with a 2.5 MMBtu/hour RTO, identified as RTO-C1.

(3) One (1) Topcoat #C1 Cool Down Area, using no controls.

(4) One (1) main paint mix room.

(i) One (1) Electrodeposition (ED) coating line with supporting multi-stage cleaning process equipment, identified as Unit 101, approved in 2020 for construction, with a material combined usage rate (excluding water) of 81,000 gallons per year, using no control, and exhausting through supporting stack(s). This coating line consists of the following:

(1) One (1) natural gas-fired pretreatment boiler, with a heat input capacity of 7.5 MMBtu per hour.

(2) One (1) ED natural gas-fired curing oven, consisting of multiple burners, with a total heat input capacity of 7.0 MMBtu per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☒ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rule:

New Source Performance Standards (NSPS): Automobiles and Light-Duty Trucks [40 CFR Part 60, Subpart MM]

Applicability Information:

The provisions of this subpart apply to the following affected facilities in an automobile or light-duty truck assembly plant: each prime coat operation, each guide coat operation, and each topcoat operation

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: oxidizer temperature		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:
Quarterly VOC reports for the controlled monthly volume weighted average mass of VOC per volume of applied coating solids in Electrodeposition prime (ED), Intermediate (Guide Coat), and Topcoat operations indicate compliance with the emission limits of NSPS Subpart MM. And there were no deviations of the Continuous Parameter Monitoring System (CPMS) for temperature on the oxidizers in the Paint #1 and Paint #2 operations. See sections D.4 and D.10 for details.
Permit Section Compliance Status:
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.3 NESHAP- 40 CFR 63, Subpart EEEE

(Organic Liquids Distribution -Non-Gasoline)

Emission Units and Control Devices:

Emissions Unit Description:

A.2(j)(2) One (1) windshield washer fluid storage tank, with a capacity of 15,000 gallons, constructed in 2018.

Insignificant Activities:

A.3(e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(5) One (1) Antifreeze storage tank, with a capacity of 15,000 gallons, installed in 2018.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

National Emission Standards for Hazardous Air Pollutants (NESHAP): Organic Liquids Distribution (Non-Gasoline) [40 CFR Part 63, Subpart EEEE]

Applicability Information:

You are subject to this subpart if you own or operate an organic liquid distribution (OLD) operation that is located at, or is part of, a major source of HAP emissions. An OLD operation may occupy an entire plant site or be collocated with other industrial (e.g., manufacturing) operations at the same plant site.

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: leak detection and repair		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

The notification of compliance status for NESHAP Subpart EEEE (Organic Liquid Distribution) have been received by IDEM and indicated that the appropriate monthly/quarterly leak detection and repair is being conducted on required pumps, valves for Line A and B transfer racks. Semi-Annual NESHAP Subpart EEEE Reports have been submitted timely and indicate compliance.

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.4 NESHAP- 40 CFR 63, Subpart DDDDD
(Industrial, Commercial, and Institutional Boilers and Process Heaters)

Emission Units and Control Devices:

Emissions Unit Description:

Permit Section	Emission Unit Name (design and Manufacturer name)	Rated Heat Input Capacity (MMBtu/hr)	Fuels Used
New Emission Unit			
Permit Section D.10(a)(1)	Pretreatment ED Boiler (2016)	6 units rated at 1.3 MMBtu/hr each, 7.8 MMBtu/hr total	Natural Gas
Permit Section D.10(a)(3)(C)	Spray Booth Boiler	6 units rated at 1.25 MMBtu/hr each, 7.5 MMBtu/hr total	Natural Gas
Existing Emission Units			
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 1, 2, 3, 4, 5, & 6 Lochinvar Sync (2009)	1.5 MMBtu/Hr each	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B1-01 Cleaver Brooks (2018)	1.67 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Hot Water Boilers, identified as B1-2018, B2-2018 and B3-2018 (2018)	2.5 MMBtu/Hr each 9.0 MMBtu/Hr total	Natural Gas
Permit Section D.8(a)	Three Boilers- B1-2015, B2-2015 and B3-2015 (2015)	3.0 MMBtu/Hr each, 9.0 MMBtu/Hr total	Natural Gas
Permit Section D.8(a)	Two Boilers, GWH1-01, GWH1-02 (1999)	0.3 MMBtu/Hr each	Natural Gas
Permit Section D.11.3	One Boiler, ED Pretreatment Boiler (2020)	7.5 MMBtu/Hr	Natural Gas

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

National Emission Standards for Hazardous Air Pollutants (NESHAP): Industrial, Commercial, and Institutional Boilers and Process Heaters Requirements [40 CFR Part 63, Subpart DDDDD]

Applicability Information:

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler or process heater as defined in § 63.7575 that is located at, or is part of, a major source of HAP.

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: boiler tune ups		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:
Facility is conducting boiler tune-ups as required.

Permit Section Compliance Status:
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.5 NSPS- 40 CFR Part 60, Subpart JJJJ

(Stationary Spark Ignition Internal Combustion Engines)

Emission Units and Control Devices:

Emissions Unit Description:

Insignificant Activities:

(a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(3) Other insignificant natural gas combustion units approved in 2014 and 2016 for construction: [326 IAC 2-2]

(D) Emergency Equipment:
(1) One (1) natural gas-fired emergency generator with a maximum heat input capacity of 4.8 MMBtu/hr (rated at 636 HP), permitted in 2016 for construction.

(f) Activities associated with emergencies, including the following:

Emergency generators as follows:

(2) Natural gas turbines or reciprocating engines not exceeding sixteen thousand (16,000) horsepower.

(B) One (1) 147 HP natural gas fired emergency engine, installed in 2007

(C) One (1) 54 HP natural gas-fired emergency generator, permitted in 2016 for construction.

(D) One (1) 460 HP certified natural gas-fired emergency generator, identified as Gen 1, approved in 2023 for construction.

(E) One (1) 470 HP certified natural gas-fired emergency generator, identified as Gen 2, approved in 2023 for construction.

Subaru Logistics Warehouse

(b) One (1) emergency natural gas-fired 1135-HP generator, permitted in 2021, with a maximum heating input capacity of
10.32 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☒ NO_X ☒ CO ☒ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☐ HAPS

Applicable Rule:

New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines [40 CFR Part 60, Subpart JJJJ]

Applicability Information:

The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE)

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: Hours of operation, maintenance records.		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

See section E.6

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.
☐ The following violations were determined for this permit section at the time of the inspection:

PERMIT SECTION E.6 NESHAP- 40 CFR 63 Subpart ZZZZ

(Reciprocating Internal Combustion Engines (RICE))

Emission Units and Control Devices:

Emissions Unit Description:

Insignificant Activities:

(a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(3) Other insignificant natural gas combustion units approved in 2014 and 2016 for construction: [326 IAC 2-2]

(D) Emergency Equipment:
(1) One (1) natural gas-fired emergency generator with a maximum heat input capacity of 4.8 MMBtu/hr (rated at 636 HP), permitted in 2016 for construction.

(f) Activities associated with emergencies, including the following:

Emergency generators as follows:

(1) Diesel generators not exceeding one thousand six hundred (1,600) horsepower.

(A) One 760 HP diesel fueled emergency engine, installed in 1989.

(2) Natural gas turbines or reciprocating engines not exceeding sixteen thousand (16,000) horsepower.

(A) One (1) 197 HP natural gas fired emergency engine, installed in 2002.

(B) One (1) 147 HP natural gas fired emergency engine, installed in 2007.

(C) One (1) 54 HP natural gas-fired emergency generator, permitted in 2016 for construction.

(D) One (1) 460 HP certified natural gas-fired emergency generator, identified as Gen 1, approved in 2023 for construction.

(E) One (1) 470 HP certified natural gas-fired emergency generator, identified as Gen 2, approved in 2023 for construction.

Stationary fire pump engines as follows:

(1) Two 375 HP diesel fired emergency fire pumps, installed in 1989.

Subaru Logistics Warehouse

(b) One (1) emergency natural gas-fired 1135-HP generator, permitted in 2021, with a maximum heating input capacity of 10.32 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

National Emission Standards for Hazardous Air Pollutants (NESHAP): Reciprocating Internal Combustion Engines (RICE) [40 CFR Part 63, Subpart ZZZZ]

PERMIT SECTION E.6 NESHAP- 40 CFR 63 Subpart ZZZZ (Reciprocating Internal Combustion Engines (RICE))		
Applicability Information:		
You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions.		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Compliance Monitoring Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Testing Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: hours of operation, maintenance records		
Reporting Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No
Observations and Comments:		
The emergency generators are run either monthly or quarterly depending on the unit to test capability. Each unit has a nonresettable hour meter, and the facility is tracking the usage as per NSPS Subpart JJJJ and NESHAP Subpart ZZZZ.		
Permit Section Compliance Status:		
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐ The following violations were determined for this permit section at the time of the inspection:		

PERMIT SECTION E.7 NESHAP- 40 CFR Part 63, Subpart PPPPP

(Engine Test Cells/Stands)

Emission Units and Control Devices:

Emissions Unit Description:

(e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO2; 5 lb/hr or 25 lb/day NOx; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(3) Engine assembly and testing activities, originally permitted under E 157-14535-00050, issued on October 10, 2001, and subsequently modified as described:

(B) One (1) engine dynamometer, identified as EDM, installed in 2001.

(C) Five (5) engine test benches, identified as ETB1 - ETB5, installed in 2011.

(D) Four (4) engine test benches, identified as ETB6- ETB9, permitted in 2016 for construction to allow the source to test more engines on an hourly basis to support vehicles being assembled on a daily basis, and one (1) engine test bench, identified as ETB10, approved in 2017 for construction to accommodate 514,000 vehicles per year.

(E) One (1) engine test bench, identified as ETB11, with a maximum throughput rate of 64,000 engines/year, approved for construction in 2018.

(F) One (1) natural gas-fired RTO (ENG-RTO) rated at 5.5 MMBtu/hr, permitted in 2017 to control emissions from engine test benches ETB1 through ETB11 and the engine dynamometer.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Pollutants with Emission Limits or Applicable Standards:

☐ SO_2 ☐ NO_X ☐ CO ☐ VOC ☐ PM ☐ PM_{10} ☐ $PM_{2.5}$ ☒ HAPS

Applicable Rule:

National Emission Standards for Hazardous Air Pollutants (NESHAP): Engine Test Cells/Stands [40 CFR Part 63, Subpart PPPPP]

Applicability Information:

You are subject to this subpart if you own or operate an engine test cell/stand that is located at a major source of HAP emissions

Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	☒ Yes ☐ No	☐ Yes ☒ No
Work Practice/Operating Requirements	☐ Yes ☒ No	☐ Yes ☐ No
Compliance Monitoring Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Testing Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Record Keeping Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Types of Records Reviewed: oxidizer temperature		
Reporting Requirements	☒ Yes ☐ No	☐ Yes ☒ No
Preventive Maintenance Plan [326 IAC 1-6-3]	☐ Yes ☒ No	☐ Yes ☐ No

Observations and Comments:

On November 10, 2022, stack testing was conducted on the RTO for the test engines to demonstrate compliance with NESHAP Subpart PPPPP. The VOC emissions were measured at 0.52 ppmdv@15% O_2 during the test (limit of 20 ppmdv@15% O_2). The temperature established during this stack testing was 1718 °F.

On all their oxidizers the facility is continuously monitoring and recording the operating temperature every minute and translates that to a 3-hour average for historical review. The facility also monitors duct pressure or fan amperage on their oxidizers on a daily basis. See summary chart below for the readings taken during the inspection.

Regenerative Thermal Oxidizer	Observed during Inspection	Observed during inspection	Minimum established at most recent stack testing	Minimum established at most recent stack testing
	Temperature (3-hr avg)	Duct Pressure (inches H_2O)	Temperature (3-hr avg)	Duct Pressure (inches H_2O)
Engine Testing (ENG-RTO)	1729° F	10.4" H_2O	1718° F	10.3" H_2O

The control logic for the oxidizer is set up such that when the temperature reaches a predetermined lower limit an alarm makes that known to the operator who then takes corrective action. The lower limits for temperature on all control devices is at the minimum temperature established at the most recent stack testing. Also, all the oxidizers in the plant are interlocked with the line conveyors, such that if the oxidizers shut down the production line stops.

	Lower Limit
ETB1-ETB11 – Engine Testing (ENG-RTO)	1718 °F

The facility has a Startup, Shutdown, Malfunction (SSM) plan for compliance with NESHAP Subpart PPPPP. No deviations of the emission limits or work practices were observed. And there were no deviations of the Continuous Parameter Monitoring System (CPMS) for temperature on the oxidizer for the engine testing system.

Permit Section Compliance Status:

☒ No violations were observed or determined for this permit section at the time of the inspection.

☐ The following violations were determined for this permit section at the time of the inspection:

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed: ☒ Annual Compliance Certification(s) ☒ Deviation & Compliance Monitoring Report(s) ☐ Annual Notification(s) ☒ Emission Statement(s)	
The reports are consistent with inspection observations.	☒ Yes ☐ No ☐ N/A
The permit accurately represents emission units observed on site.	☒ Yes ☐ No ☐ N/A
Compliance assistance was provided during the inspection.	☐ Yes ☒ No ☐ N/A
The source is required to have a Risk Management Plan [40 CFR 68].	☐ Yes ☒ No
If yes, the source has a plan.	☐ Yes ☐ No ☐ N/A
If yes, the employees have been trained.	☐ Yes ☐ No ☐ N/A
Additional Information and Comments:	
N/A	
Additional Source Compliance Review Status:	
☒ No violations were observed or determined for this permit section at the time of the inspection. ☐ The following violations were determined for this permit section at the time of the inspection:	

INSPECTION FINDINGS	
☒ No violations were observed or determined at the time of the inspection. ☐ The following violations were determined at the time of the inspection:	
RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions to Ms. Klaas prior to exiting the facility.

ATTACHMENTS
• N/A