

**Prevention of Significant Air Quality Deterioration Review  
And 112(g) Case-By-Case Maximum Achievable Control Technology Determination  
Of the DiamlerChrysler Manufacturing International, LLC  
Motor Vehicle Assembly Plant Construction  
Located in Pooler, Chatham County, Georgia**

**FINAL DETERMINATION  
SIP Permit Application No. 14178  
June 2003**

**Reviewing Authority**

**State of Georgia  
Department of Natural Resources  
Environmental Protection Division  
Air Protection Branch**

**Ron Methier – Chief, Air Protection Branch**

**Stationary Source Permitting Program**

**James Johnston, P.E.  
Terry Johnson  
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Elisabeth Munsey**

**Planning & Support Program**

**Dale Kemmerick  
James Stogner**

## Background

On December 18, 2002, DaimlerChrysler International Manufacturing, LLC submitted to the Environmental Protection Division (the Division) an application for an air quality permit to construct and operate a vehicle assembly plant in Pooler, Chatham County, Georgia.

On May 6, 2003, the Division issued a Preliminary Determination stating that the construction and operation of the automobile assembly plant should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the facility.

The Division placed a public notice in a newspaper of general circulation in the area of the proposed facility notifying the public of the proposed construction and providing the opportunity for written public comment. The public notice also identified the date and location of a public meeting/public hearing to be held by the Division on this permit application. Such public notice was placed in *Savannah Morning News* (legal organ for Chatham County) on May 9, 2003. A public hearing was held on June 9, 2003 in Savannah, Chatham County, Georgia. During the comment period, comments were received from DaimlerChrysler, EPA, and members of the local community. During the public meeting/public hearing, members of the local community expressed their support for issuance of the permit. The public comment period expired June 9, 2003.

The requested permit changes are described below along with the Division's written responses. The discussion will not elaborate on typographical or grammatical revisions made to the final permit. The permit has been changed based on the comments.

A copy of the final permit is provided in Appendix A. A copy of the written comments received during the public comment period is provided in Appendix B.

## Review of DaimlerChrysler Comments

### 1. **Permit Cover Page**

**Comment:** The applicant provided an update to the facility address and name.

“Please revise the Permittee mailing address on page 1 of the permit to the following DCMI temporary USA address. Also, DaimlerChrysler AG is still determining how the assets of the factory will be held, and it is requested that the permit be flexible for a possible name change.

Temporary mailing address:  
DaimlerChrysler Manufacturing International LLC  
190 B Crossroads Parkway  
Savannah, Georgia 31422”

**Response:** The Division has updated the permit cover page based on the requested change.

**2. General Comment No. 1**

**Comment:** The applicant notes, “We believe that in several instances the published draft PSD Permit includes certain conditions that are inappropriately based on the provisions of the U.S. Environmental Protection Agency’s (“EPA”) proposed MACT surface coating rule for automobiles and light duty trucks. See EPA, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, 67 Fed. Reg. 78,612 (2002) (the “Proposed Auto/LDT Rule”). As discussed below, we recommend that several specific provisions of the draft PSD Permit be modified to delete the improper reliance on the Proposed Auto/LDT Rule or otherwise provide appropriate flexibility to DCMi consistent with the relevant EPA guidance and regulatory policies under the federal Clean Air Act (“CAA”).”

**Response:** The Division’s 112(g) analysis was based on the Proposed Auto/LDT Rule. The Division agrees that it should consider changes where the facility has requested specific deviations from the proposed rule. The Division has considered all specific requested changes and has made those changes, where it is appropriate to do so.

**3. General Comment No. 2**

**Comment:** The applicant notes, “In connection with its issuance of the draft PSD Permit, the Georgia Environmental Protection Division (“EPD”) has conducted a “case-by-case” analysis of the maximum achievable control technology (“MACT”) and related requirements for the Plant’s anticipated HAP emissions pursuant to section 112(g) of the CAA. The EPD has used this case-by-case MACT analysis to identify certain HAP emission limitations and conditions that the Division has now proposed for inclusion in the PSD Permit. As part of this process, EPD appears to have established several of the PSD Permit conditions based on the specific MACT and HAP-related requirements proposed by EPA in the Agency’s Proposed Auto/LDT Rule. EPD, Notice of MACT Approval, SIP Permit Application No. 14178 at 15-21 (May 2003).”

**Response:** As with General Comment No. 1, the Division’s 112(g) analysis was based on the Proposed Auto/LDT Rule. The Division agrees that it should consider changes where DCMi has requested specific deviations from the proposed rule. The Division has considered all specific requested changes and has made those changes, where it is appropriate to do so.

**4. General Comment No. 3**

**Comment:** The applicant notes, “As an initial matter, we believe that it is premature at the present time to directly incorporate into the PSD Permit certain of the proposed requirements of the Proposed Auto/LDT Rule. As the EPD is aware, EPA received an extensive number of comments on this proposed rule. In fact, many organizations in the automotive industry filed detailed comments requesting that key provisions of the Auto/LDT Rule proposal be revised substantially before EPA issues its final rule. Any such final rule is not currently scheduled to be issued by the Agency until the Spring of 2004, and given the wide-ranging comments submitted to EPA, the final rule could be considerably different from the proposal that EPD has used to draft certain provisions of the PSD Permit.”

**Response:** Where DCMi has commented on specific provisions, the Division has considered the changes and has made those changes as appropriate. When the Auto/LDT Rule is promulgated, the Division may reopen the permit, in order to incorporate the promulgated standards per 63.44(b) & (c).

**5. General Comment No. 4**

**Comment:** The applicant notes, “Furthermore, EPD certainly is not “required” to adopt the requirements outlined in the Proposed Auto/LDT Rule as specific conditions in DCMI’s draft PSD Permit. Rather, EPA’s NESHAP regulations indicate that permitting authorities are obligated only to “consider” the HAP emission limitations and related requirements identified in such proposed rules when conducting a “case-by-case” MACT analysis for a particular facility. See, e.g., 40 C.F.R. § 63.43(d)(4).”

**Response:** The Division’s 112(g) analysis was based on the Proposed Auto/LDT Rule. The Division agrees that it should consider changes where DCMI has requested specific deviations from the proposed rule. The Division has considered all specific requested changes and has made those changes, where it is appropriate to do so.

**6. General Comment No. 5**

**Comment:** The applicant notes, “Based on the foregoing, we believe that EPD clearly can and should modify several of the proposed PSD Permit provisions that are inappropriately based on EPA’s Proposed Auto/LDT Rule.”

**Response:** The Division agrees that it should consider changes where DCMI has requested specific deviations from the proposed rule. The Division has considered all specific requested changes and has made those changes, where it is appropriate to do so.

**7. General Comment No. 6**

**Comment:** The applicant notes, “EPD should modify conditions to eliminate the requirement that for compliance monitoring purposes, the “HAP control efficiency . . . shall [be] assumed to be zero” for any thermal oxidizer used to control surface coating emissions at which the temperature in the oxidizer’s combustion chamber falls below the “excursion temperature.” This requirement appears to be based on a provision of EPA’s Proposed Auto/LDT Rule, proposed section 63.3161(j), which has been strongly challenged in comments previously submitted to EPA on that proposed rule. This proposed MACT rule requirement certainly should not be applied to existing VOC standards. This condition ignores the possibility of developing demonstrations (credible evidence), through testing, of thermal oxidizer destruction efficiencies at average operating temperatures below that maintained during “the compliance performance test.”

**Response:** The Division reviewed recently issued Title V permits with thermal oxidizers controlling VOCs including two existing automobile assembly plants. In addition, discussions with the author of the Auto/LDT Rule have indicated that the “zero efficiency” may be removed from the rule. As a result, the Division has changed the requirement to be consistent with the requirements of 40 CFR Part 60 Subpart MM.

**8. General Comment No. 7**

**Comment:** The applicant notes, “We find the draft PSD permit overly prescriptive in the incorporation of periodic monitoring, record keeping, and reporting requirements that might be appropriate for the title V permit, which will be needed in about four years, but complicate this PSD construction permit. Many of the conditions may be authorized or required for operating permits by the Part 70 and state monitoring regulations for the purpose of assuring continuous compliance with limits, but are not requirements of the underlying emission standards. For some conditions a range of rules are inappropriately or incorrectly referenced. This will make it difficult to identify the requirements of applicable rules, as opposed to monitoring and reporting

imposed by permit to assure compliance with standards, and difficult to attain the streamlined and flexible permitting approach per EPA's White Paper reports. We recommend that EPD 1) review the rule citations and 2) delete conditions that are not specifically required by current applicable rule and that might be more appropriately developed later (by DCMI and EPD concurrence) to meet DCMI's compliance assurance obligations under title V."

**Response:** The Division believes that the proposed monitoring is appropriate for assuring compliance with the applicable regulations. Where DCMI has commented on specific changes, the Division has reviewed and addressed those changes as appropriate.

**9. Draft Condition 3.1**

**Comment:** The applicant requested, "that the allowable VOC emission from the entire plant be adjusted to 858 tons during any twelve consecutive months. This adjustment results from revised estimates of sealant VOC content and capture."

**Response:** The plant-wide VOC limit in the permit has been revised to 859 tons per year, based on a review of the calculations submitted by DCMI.

**10. Draft Condition No. 3.1.2**

**Comment:** The applicant requests the flexibility to burn fuel oil in the hot water generators. "DCMI disagrees with the condition that fuel oil may be burned only when the supply of natural gas is curtailed and requests that it be deleted or modified. The plant should have the flexibility to burn backup fuel oil in the hot water generators to the extent allowed by the fuel limit. The application demonstrated BACT with a dual fuel burner using natural gas as the primary fuel and up to 1,000,000 gallons per year of #2 fuel oil as secondary fuel. The annual allowable fuel oil usage constitutes only about 9% of the installed heat input capacity and 12% of potential NOx emissions. Equipment suppliers indicate that no dual fuel low-NOx burner that they are aware of is capable of meeting all of the emission estimates for LNB/FGR units for each fuel in U.S. EPA Publication AP-42. The predicted fuel oil NOx emission is a variable factor depending upon the fuel-bound nitrogen content. With the 30 ppm NOx natural gas burner, 140 ppm NOx on fuel oil is the maximum guaranteed emission value based on the possible range of #2 fuel oil nitrogen content up to 0.05%, by weight. Actual NOx performance may be around 90 ppm on fuel oil, if fuel-bound nitrogen content is in the range of 0.015% to 0.020%. Also, the PSD air quality assessments demonstrate conformance with all criteria, while assuming with the maximum allowed fuel oil usage. As written, the condition does not allow fuel oil to be burned for testing and tuning of boilers, to turn-over aging fuel supplies, or to avoid short term market cost penalties. Pricing for fuel oil and natural gas fluctuate monthly in Georgia, and a spike in gas pricing could be a legitimate reason to burn fuel oil for short periods. At the current guaranteed fuel oil NOx performance, the cost-effectiveness to preferentially burn natural gas, when the cost of natural gas is \$0.45/million Btu higher than fuel oil, exceeds \$6,000/ton of potential NOx reduction. As a real case example, the cost of natural gas went to around \$10/million Btu in January-February 2001. No. 2 distillate oil prices also increased during this period to around \$1.00/gallon (~\$7.15/million Btu). The cost effectiveness of burning natural gas in lieu of fuel oil for the purpose of NOx emission reduction during this period of price fluctuation would have been about \$40,000/ton of NOx reduction. Even dual-fuel sources in the Atlanta nonattainment area routinely burn fuel oil outside of the summer months when there is a cost advantage. We find the prohibition unfair unless it is uniformly imposed regionally. If the condition remains in a modified form, we suggest using the term "fuel-burning equipment" from Georgia rule, in lieu of "fuel combustion units". Suggest deleting emergency generators from this condition, they are not "fuel-burning equipment", and do not need to be included in this permitted source condition."

**Response:** Limiting the usage of fuel oil to times of natural gas curtailment was based on information submitted in DCMI's application. Condition 3.1.2 can be changed to allow for the burning of fuel oil during times other than natural gas curtailment. The draft permit did not require monitoring while burning fuel oil because fuel oil combustion was only allowed during limited times when the natural gas supply was curtailed. If combustion of fuel oil is to be allowed during periods when the natural gas supply is not curtailed, however, then additional monitoring will be required. Quarterly monitoring of NOx for both fuel oil as well as natural gas have been added to Condition No. 5.2.5.

**11. Draft Condition 3.1.6**

**Comment:** The applicant notes, "The condition is a little confusing with the wording regarding replacement of particulate exhaust filters serving any paint spray booths. Suggest removing the word "any" in front of paint spray booths. Could delete it or move it to say, 'replace any particulate filters serving paint spray booths, sanding ...in accordance with manufacturer recommendations...'"

**Response:** The permit has been revised. The word "any" has been removed.

**12. Draft Condition 3.1.7 through 3.1.10**

**Comment:** BACT limits for surface coating activities: In the PSD application DCMI proposed separate BACT limits for light duty truck electrodeposition prime coat, guidecoat, monocoat, and basecoat/clearcoat activities in terms of pounds VOC emission per gallon of applied coating solids (lb/GACS). For medium duty truck surface coating activities, BACT limits were intended to be proposed in terms of pounds VOC per gallon of coating as applied, minus water, and/or pounds VOC per gallon of coating solids as applied. As drafted, the PSD permit has uniform LDT and MDT BACT limits in units of lb/GACS for each of the surface coating activities. DCMI has confirmed that the MDT surface coating activities can conform to the draft BACT limits and requests no change to the permit limits at this time. However, we have reviewed the predicted MDT surface coating performance in terms of lbs VOC per gallon of coating as applied minus water and terms of lbs VOC per gallon of coating solids as applied, and find that the alternative limits would be no less stringent than the lb/GACS limits imposed in this permit. DCMI may at a future date request revision of the BACT limits for MDT to the alternative units for simplification of compliance determination and consistency with the Georgia VOC limits and HAP limits for surface coating of miscellaneous metal parts and products.

**Response:** The Division will evaluate the request at such time it is received.

**13. Draft Condition 3.1.7 (See Attachment)**

**Comment:** BACT emission performance limit for E-coat: The most stringent BACT or LAER determination for any auto and light truck primer operation is 0.04 lb VOC/gacs. The basis for the emission estimate at each of the E-coat primer operations having this limit is a presumptive 100% transfer efficiency (as provided for by NSPS) and presumptive 100% capture efficiency and 95% destruction efficiency of the primer system oxidizer. As an example, Michigan permits for GM specify demonstration of monthly lb VOC/gacs using primer system thermal oxidizer tested destruction efficiency and assumed 100% transfer and capture efficiencies. The DCMI predicted actual average emission factor for E-coat Primer is 0.034 lb/gacs, based on a presumptive 100% transfer efficiency and 100% capture efficiency and 95% thermal oxidizer destruction efficiency, similar to other facilities. Rounding up to 0.04 lb/gacs for a BACT limit, consistent with the lowest permit limit for other e-coat operations, would provide a small margin

of compliance with the short-term monthly average. It is proposed that the permit condition E-coat limit be revised to read as follows: “0.04 pounds per gallon of applied coating solids (0.0048 kilograms per liter of applied coating solids) as averaged on a monthly basis. Electrodeposition prime coating emissions shall be calculated using presumed 100% transfer efficiency and 100% capture efficiency and demonstrated thermal oxidizer destruction efficiency”.

If these E-coat system operating conditions cannot be assumed for calculation of emissions, we must recalculate the limit.

**Response:** The permit has been revised accordingly. The E-coat limit has been changed to 0.04 lbs/gacs (0.0048 kg/lacs) in order to provide for a margin of compliance. The change does not affect the BACT analysis because the calculations were based on 0.034 lbs/gacs. Based on design criteria and standard industry practice, it is presumed that the Ecoat dip tank will exhibit 100% transfer efficiency, and that the Ecoat drying oven will exhibit 100% VOC Capture Efficiency.

**14. Draft Condition 3.1.11 (See Attachment)**

The proposed and draft permit limit for combined VOC content of sealers, underbody coatings, sound deadeners and cavity waxes is 0.4 lb/gallon, as averaged on a monthly basis. Recent sealers BACT determinations for auto assembly have ranged from 0.3 to 0.64 lb VOC per gallon. The long term average is now estimated to be closer to the lowest BACT determination of 0.3 lb/gallon (between 0.29 and 0.33 lb/gallon), based on using possible substitute materials. However, these materials have not been analyzed using U.S. EPA methods, and any process material changes are subject to product testing and approval. A BACT VOC content limit of 0.4 pounds per gallon, excluding water, as averaged on a monthly basis, is requested to allow for margin of compliance and the flexibility necessary when bringing a new product to market. We cannot commit DCMI to a lower monthly limit at this time. The proposed total annual VOC emission will be based on the estimated actual emission.

Additional documentation is attached regarding current European formulation and possible substitute materials. Emission calculations are revised using updated capture and control estimates. It is requested that the total annual VOC emission limit be adjusted for the revised sealant calculations.

**Response:** The VOC limit, for sealers, underbody coatings, sound deadeners and cavity waxes will remain at 0.4 lbs/gallon, excluding water, as averaged on a monthly basis.

**15. Draft Condition 3.1.12**

**Comment:** This condition ties a monthly limit on miscellaneous solvent losses, including non-production cleaning materials, to vehicles produced. It might not be possible to meet the miscellaneous VOC/vehicle limit (1.7 lb/vehicle) during a month when there is a major turnaround and little production. DCMI requests changing the limit to a 12 month rolling average limit or other wording to accommodate these periods. Wording similar to Condition 3.1.13 might be appropriate, “pounds per unit of the vehicles produced over any twelve (12) consecutive month period.

**Response:** The permit has been revised so that the facility must meet comply with this limit as averaged on a rolling twelve month basis.

**16. Draft Condition 3.1.15**

**Comment:** The requirements of this condition do not appear in Rule 391-3-1-.02(2)(ii), and it is proposed that this reference be deleted.

**Response:** The citation has been revised accordingly.

**17. Draft Condition No. 3.2**

**Comment:** The applicant suggests, “listing 40CFR60 Subpart MM for clarity, unless it can be stated that it is subsumed by another rule. However, if Subpart MM is listed, we do not think it necessary to spell out the conditions here. The requirements are applicable regardless of whether restated in the permit, plus they are no longer the limiting performance requirements.”

**Response:** The permit has been revised accordingly. Condition No. 3.2.3 has been added to incorporate 40 CFR Part 60 Subpart MM, by reference, into the permit.

**18. Draft Condition No. 3.3**

**Comment:** The applicant notes, “Auto Alliance has taken exception to numerous auto/MACT proposed rule conditions, and other groups are commenting on the other MACTs. DCMI has proposed case-by-case MACT performance limits that conform to the proposed standards. However, we do not agree with numerous proposed monitoring, record keeping and reporting requirements, especially as they relate to performance assumption during parameter deviations. It is suggested that the Notice of MACT Approval acknowledge the planned conformance to the proposed categorical performance standards for surface coating of automobiles and light duty trucks and for surface coating of miscellaneous metal parts and products. However, it is requested that use of the more controversial requirements of the proposed rules, which are likely to be modified, be minimized. If the requirements are promulgated in final rule, they will be applicable in the operating permit regardless of whether they are included in this construction permit. However, if inappropriate conditions are included now as part of a case-by-case permit, they could be more difficult to remove at a later date.”

**Response:** Where DCMI has commented on specific provisions, the Division has considered the changes and has made those changes as appropriate. When the Auto/LDT Rule is promulgated, the Division may reopen the permit in order to incorporate the promulgated standards as per 63.44(b) & (c).

**19. Draft Condition 3.5.1**

**Comment:** The applicant notes, “This condition requires set point operation at the same temperature as during the test. This is similar to the requirement for reporting average periods of operation >50°F below the average value established during a compliance demonstration test and may be unnecessary. This potentially sets up a conflicting interpretation as a reportable violation. We have not found that this is a stated requirement of any of the cited rules; NSPS, 40CFR63, Rule (t), Rule (ii), etc.; and proper operation, monitoring and reporting is adequately covered elsewhere. As a blanket requirement it does not provide for the normal exception for startup, shut-down, and malfunction. We are not clear as to the consequence of not abiding by this condition. We request deletion of this condition. If EPD determines that a rule(s) requires such a specific condition, we suggest revised wording similar to the following: “The Permittee shall, during all periods of the operation of any of the coating operations/processes, operate the thermal oxidizer(s) serving the coating operation(s)/processes using the same or similar operating

parameters as those used during compliance tests and setting the burner controller to maintain the average combustion chamber temperature at or greater than that during the compliance performance test(s) at which destruction efficiency of the oxidizer(s) was determined.” that this condition is redundant and requests deletion.”

**Response:** The Division reviewed recently issued Title V permits with thermal oxidizers controlling VOCs including two existing automobile assembly plants. In addition, discussions with the author of the Auto/LDT Rule have indicated that the “zero efficiency” may be removed from the rule. As a result, the Division has changed the requirement to be consistent with the requirements of 40 CFR Part 60 Subpart MM. The term “set point” has been changed to combustion zone temperature in Condition No. 3.5.1, and a startup, shutdown, malfunction clause has been added. In addition, the references 40 CFR 52.21 – PSD, 40 CFR 63 Subpart B (112(g)), and NSPS have been removed from the citations.

**20. Draft Condition 3.5.2**

**Comment:** The applicant notes, “this condition is similar to other general requirements for proper operation of equipment and could be deleted.”

**Response:** Condition No. 3.5.2 specifically addresses the proper operation of the capture systems associated with the control equipment. A startup, shutdown, and malfunction clause has been added to the condition. In addition, the references 40 CFR 52.21 – PSD, 40 CFR 63 Subpart B (112(g)), and NSPS have been removed from the citations.

**21. Draft Conditions 3.5.1 & 3.5.2**

**Comment:** The applicant notes, “that conditions 3.5.1 and 3.5.2 should be modified to clarify that the periodic compliance testing performed under the PSD Permit will be used only to determine whether control devices at particular emission units are operating properly. As currently drafted, these conditions suggest that the failure to strictly adhere to certain testing-derived operating parameters for the thermal oxidizers and certain other emission control devices at the Facility could potentially be used as the basis for possible enforcement actions, even if the Facility meets the applicable pound of HAPs per gallon of applied coating standard set forth under condition 3.3. We believe that this approach would be inconsistent with federal policies under the CAA, which have indicated that a facility’s compliance with the applicable HAP emission standards should be the sole basis for determining a facility’s compliance status for HAPs.

It appears that conditions 3.5.1 and 3.5.2 incorporate certain concepts from EPA’s Proposed Auto/LDT Rule under which variations in an operating parameter could be the basis for an enforcement action for violations of the CAA. As noted in prior comments on the Agency’s Proposed Auto/LDT Rule, EPA’s traditional approach has been to use operating parameters simply as general performance indicators to demonstrate that a facility’s emissions are satisfying the applicable emissions standards or limits for HAPs or other regulated air pollutants. See, e.g., 40 C.F.R. Part 64 (EPA’s “Compliance Assurance Monitoring” or “CAM” rule, which was published at 62 Fed. Reg. 54,900 (1997)). Nevertheless, the Agency’s Proposed Auto/LDT Rule – and as embodied in conditions 3.5.1 and 3.5.2 – appears to elevate operating parameters to a higher status such that the failure to adhere to these parameters themselves could result in a permit violation, regardless of whether the facility was still complying with its applicable emission limits for HAPs.

Thus, based on this concern, we would recommend that the text of conditions 3.5.1 and 3.5.2 be revised to add the following clarifying language:

‘The operating parameters established by such compliance test(s) shall be used only to evaluate whether emission control equipment is operating properly. The Permittee may demonstrate that the applicable emission standards and limits set forth in Part 3.0 of this permit have been achieved even where such operating parameters are not strictly followed.’”

**Response:** The permit has been revised in response to this comment. The term “set point” has been changed to combustion zone temperature in Condition No. 3.5.1, and a startup, shutdown, malfunction clause has been added to both conditions. The authority behind Conditions 3.5.1 and 3.5.2 is the “good air pollution control practice” provision of Georgia Rule 391-3-1-.02(a)10. The citation following these conditions has been changed accordingly.

**22. Draft Condition 4.1.3m**

**Comment:** The applicant requests “alternative methods to just Method 311 for determination of HAP content per proposed 40 CFR 63.3151 or other MACT rules, which allow Method 24, alternative approved methods, or information from the supplier or manufacturer of the material. This listing of methods needs more flexibility.

**Response:** Section 1.2 of the Division's "Procedures for Testing and Monitoring Sources of Air Pollution" allows for the use of alternative test methods and procedures (when requested by a facility and approved by the Director).

**23. Draft Condition 4.1.3n**

**Comment:** The applicant notes, “This sites a specific report as reference for test protocol. Please add, “or latest amendment” or other wording to make it more encompassing of test protocol revisions.”

**Response:** Section 1.2 of the Division's "Procedures for Testing and Monitoring Sources of Air Pollution" allows for the use of alternative test methods and procedures (when requested by a facility and approved by the Director). The citation (EPA-450/3-88-018) has, however, been changed to the more general nomenclature associated with this reference (EPA-450/3) to remove the reference to the specific version of the protocol. By doing so, the current version of 450/3 is the appropriate version.

**24. Draft Condition No. 4.2.1**

**Comment:** The applicant requests, “at least 60 days from request to obtain material samples and submit a report. This a VOC determination, please delete reference to NESHAP/MACT in the text and cited references.”

**Response:** The permit has been revised accordingly. The number of days allotted has been changed from 30 to 60 days and the NESHAP/MACT citation has been removed.

**25. Draft Condition No. 4.2.2**

**Comment:** The applicant requests “60 days to obtain material samples and submit the report”.

**Response:** The permit has been revised accordingly. The number of days allotted has been changed from 30 to 60 days.

**26. Draft Condition 4.2.3**

**Comment:** The applicant notes, “It is not clear what is intended by this condition, and it appears to be redundant. We request deletion of this condition. The source is already required to determine VOC content of materials, calculate conformance monthly, and report quarterly and semiannually. This appears to require reporting every month for new materials, and it increases possibility of a “reporting violation” where there is no likelihood for performance violation. It is not required by rules, and is certainly not required by Part 63 (HAPs), since this draft condition addresses VOC content determination.”

**Response:** The intent of Condition No. 4.2.3 is to require sampling and analysis only of those materials used at the facility for which the VOC content, the solids content, and/or the density have not been determined in order to show compliance with an emissions limitation. A material safety data sheet or product data sheet is sufficient evidence that a material is in compliance. In order further clarify the intent of Condition No.4.2.3 the references to other condition numbers have been removed. In addition, the number of days allotted has been changed from 30 to 90 days and 40 CFR Part 63 Subpart B(112(g)) has been removed as a citation.

**27. Draft Condition 4.3.1 c./d./e.**

**Comment:** The applicant notes, “There are no Thermal Oxidizer NOx performance requirements and basis for requiring NOx testing at this time. DCMI may test for informational purposes, but would rather this be on a DCMI initiated basis. We request deletion of Thermal Oxidizer NOx testing requirements.”

**Response:** The permit has been revised accordingly since there is no regulatory requirement to test the thermal oxidizers for NOx.

**28. Draft Condition 4.3.2**

**Comment:** The applicant notes, “For final design, some of the minor dry filter booths might not exhaust outside. We request addition of wording for testing only units exhausting to atmosphere. On each line basecoat and monocoat are conducted in the same booth. We do not see a necessity for testing each of the minor source dry filter booths listed in e. through i. We request that this test group be reduced to require PM emission testing of: one sanding or polishing deck, one sealant deck, and one Spot Repair booth.”

**Response:** The permit has been revised accordingly. The basecoat/monocoat testing has been combined since both coatings will be used in the same booth, and the testing of the booths with a low emission rate that exhaust inside the building has been removed.

**29. Draft Condition No. 4.3.3a**

**Comment:** The applicant requests the “removal of wording for determining volatile HAP destruction efficiency. The proposed auto and metal products MACT rules specify VOC destruction determination. Although we recognize that it is not the intent of the condition to require speciated HAP testing, the reference could be subject to misinterpretation.

**Response:** The permit has been revised accordingly. The term volatile HAP has been replaced with VOC.

**30. Draft Condition No. 4.3.3b**

**Comment:** The applicant requests, “strike booth from the first sentence, or replace with, “The oven exhaust control device VOC loading” or language similar to the draft Ford Atlanta Title V

permit “The mass ratio(s) between the amount of VOC sprayed to that captured by the oven(s)”. (See Section 21 of EPA’s Test Protocol for Auto and Light Duty Truck.)

Strike e-coat (EO01 oven controlled by C-EO1) from the capture efficiency test requirement, per requested compliance determination protocol basis of 100% capture assumption.

We request reduction of bake oven exhaust VOC capture efficiency testing to one of two similar line operations: GO01 or GO02 and TO01 or TO02.

**Response:** The language in Condition No. 4.3.3 has been changed from “capture efficiency” to language similar to that found in the Title V permit issued to the Ford Motor Company’s Hapeville plant; the revised wording better reflects the Division’s intent. Furthermore, the permit has been revised so that the e-coat process is removed from the testing requirements and 100% capture is assumed in the record keeping calculation requirements. Based on design criteria and standard industry practice, it is presumed that the Ecoat dip tank will exhibit 100% transfer efficiency, and that the Ecoat drying oven will exhibit 100% VOC Capture Efficiency. Other testing requirements cannot be reduced because the MACT standard requires that each capture system and each control device be tested.

**31. Draft Condition 4.3.3c**

**Comment:** The applicant requests, “revision of testing requirements for determination of transfer efficiencies to reduce the amount of very costly testing of similar coating operations and testing of operations that are not specifically required to tested for transfer efficiency by rule. The following revised wording is proposed:

The transfer efficiencies of the light duty truck (LDT) guidecoat, basecoat/clearcoat and monocoat processes. The transfer efficiency test results for LDT may be assumed to apply to and be used for calculation of medium duty truck (MDT) emissions. Until such time as LDT transfer efficiencies are determined, the default values for automobile and light duty truck surface coating operations in Subpart MM NSPS, or other credible values approved by EPD, shall be used for calculating MDT emissions. If LDT transfer efficiencies are not determined within 18 months after commencement of commercial operation of MDT surface coating operations, testing of MDT processes shall be conducted.

**Response:** Transfer efficiency testing requirements have been removed from Condition No. 4.3.3 and a new condition, Condition 4.2.5 has been added which requires the testing of transfer efficiency for light-duty trucks within 60 days after achieving maximum light duty truck production, or 180 days after startup of light duty truck production, or twenty-four months after startup of medium duty truck production, whichever comes first. Until such time that transfer efficiency occurs, DCMI will be required to assume transfer efficiencies as specified in 40 CFR Part 60 Subpart MM.

**32. Draft Condition No. 5.2.3**

**Comment:** The applicant notes, “that PSD should not be cited as basis for this requirement (solvent cleaner inspection). It seems that any referenced rule should more appropriately be the Georgia General Monitoring and Reporting Requirement [391-3-1-.02(6)(b)] or Part 70 periodic monitoring requirements. We request reduction of the inspection report recording to quarterly or deletion of this record keeping requirement for these insignificant activities.”

**Response:** PSD has been removed as a citation and replaced with 391-3-1-.02(6)(b)1. However, the record keeping requirements will remain as a monitoring requirement to demonstrate compliance with Condition No. 3.3.19.

**33. Draft Condition No. 5.2.5**

**Comment:** The applicant notes, “The requirement to measure each hot water generator exhaust quarterly seems excessive for these small Subpart Dc natural gas fired units. We suggest development of an inspection and maintenance plan in accordance with equipment supplier recommendations. If measurements must be required, suggest they be annual or semiannual, unless they show a deviation. We request that DCMI not have any more extensive monitoring requirements than similar facilities in the attainment area have, and suggest that the requirement should only be imposed if it is uniformly applied to all major sources having NOx performance requirements.”

**Response:** The Division has reviewed the proposed quarterly instrumental NOx monitoring requirement and has determined that it is appropriate for ensuring continual compliance with the NOx limits of Condition No. 3.1.1. The Division has included similar monitoring requirements for sources located in both attainment and non-attainment areas. This requirement has been expanded to include instrumental NOx measurements while burning fuel oil for those quarters in which fuel oil is combusted. The frequency of instrumental NOx measurements may be revisited when the Title V permit for this facility is issued.

**34. Draft Condition 5.3.1**

**Comment:** The applicant requests a “50°F excursion allowance per the NSPS for auto and LDT and the Proposed Addenda to EPA/Auto Protocol for Compliance Assurance Monitoring. This also applies to condition 6.1.7c, and elsewhere. A 50 °F excursion is allowed per NSPS and Condition No. 6.1.7c.

**Response:** The Division reviewed recently issued Title V permits with thermal oxidizers controlling VOCs including two existing automobile assembly plants. In addition, discussions with the author of the Auto/LDT Rule have indicated that the “zero efficiency” may be removed from the rule. As a result, the Division has changed the requirement to be consistent with the requirements of 40 CFR Part 60 Subpart MM. The excursion temperature has been set at 50 °F below that measured during the most recent compliance/performance test.

**35. Draft Condition 5.3.3 and 5.3.4**

**Comment:** The applicant notes, “We did not find these requirements in the referenced, 40 CFR 63, Subpart B. These conditions duplicate each other and other conditions/requirements. It would appear that these could be combined.

**Response:** Condition Nos. 5.3.3 and 5.3.4 are general requirements for complying with the proposed rules. These requirements are described in the proposed Auto/LDT rule specifically, §63.3100e and the Miscellaneous Metal Parts MACT specifically, §63.3960a (4).

**36. Draft Condition 6.1.2**

**Comment:** The applicant notes, “We find that this specific condition is a requirement of the Georgia General Monitoring and Reporting Requirement [391-3-1-.02(6)(b)], and is not required by the other cited rules.

**Response:** The permit has been revised accordingly and the citation has been changed.

**37. Draft Condition No. 6.1.5 and 6.1.6**

**Comment:** The applicant notes, “We suggest that these general test information record keeping requirements could be combined with requirements of 6.1.6. These requirements appear to be implemented as general Part 70 record keeping requirements and are not specified requirements of the other state and federal regulations cited.

**Response:** The requirements of these two conditions are different requirements. Condition No. 6.1.5 states the record keeping requirements related to samples and measurements related to performance testing and similar functions. Condition No. 6.1.6 states the general record keeping requirements that apply to the requirements of the permit in general.

**38. Draft Condition 6.1.7bi**

**Comment:** The applicant requests, “the VOC exceedance level for the entire plant be adjusted to 859 tons, consistent with Condition 2.1.1.”

**Response:** The permit has been revised accordingly based on the change to Condition No. 2.1.1.

**39. Draft Condition 6.1.7b.vi**

**Comment:** The applicant requests that “Revise the E-coat limits to: “0.04 pounds per gallon of applied coating solids (0.0048 kilograms per liter of applied coating solids based on monthly average.” (Per the earlier request and justification.)

**Response:** The reporting requirement has been revised accordingly.

**40. Draft Condition 6.1.7b.xi**

**Comment:** The applicant notes, “If the requested adjustment to the limit averaging period in Condition 3.1.12 is approved, this condition needs to be revised. Suggested revised wording, ‘...based on monthly average (allowed) and 12-month rolling average (exceedance)’.”

**Response:** The averaging period for reporting exceedances of Condition No. 3.1.12 has been changed to a rolling 12 month averaging period.

**41. Draft Condition 6.1.7c.viii**

**Comment:** The applicant notes, “Per the earlier discussion of hot water generator fuels, we request deletion of this condition prohibiting use of fuel other than natural gas except during curtailment.”

**Response:** Since the natural gas curtailment requirement has been removed from Condition No. 3.1.2, the reporting requirement has also been deleted.

**42. Section 6.2 Specifically Condition Nos. 6.2.1, 6.2.2, 6.2.10, and 6.2.21**

**Comment:** The applicant notes, “ (See Attachment : Proposed Addenda to EPA/Auto Protocol for CAM). See General Comments. We request that the proposed MACT rule assumption of zero efficiency during a temperature deviation be deleted in all conditions. This ignores the availability of credible evidence that this is a false assumption. There is substantial objection to

this draft rule, and it will possibly be changed. However, if it remains in the promulgated rule, it will be applicable for HAPs MACT compliance evaluation and should not apply here for VOC emission inventory. For VOC this conflicts with NSPS and EPA monitoring protocol and this certainly should not be transferred to oxidizer VOC performance.

It is requested that the monthly total VOC emission reporting level be adjusted consistent with the revised annual limit in Condition 2.1.1: “The Permittee shall notify the Division in writing if the VOC emission exceeds 72 tons during any month.”

**Response:** The Division reviewed recently issued Title V permits with thermal oxidizers controlling VOCs including two existing automobile assembly plants. In addition, discussions with the author of the Auto/LDT Rule have indicated that the “zero efficiency” may be removed from the rule. As a result, the Division has changed the requirement to be consistent with the requirements of 40 CFR Part 60 Subpart MM. Condition No. 6.2.2 been revised from “71 tons during any month” to “72 tons during any month” based on calculations submitted by DCMI.

**43. Draft Condition 6.2.4**

**Comment:** The applicant notes, “The current design concept is to have one natural gas flow meter for the paint shop, where process burners are currently based on the same emission factors.

**Response:** The Division agrees that Condition No. 6.2.4 does not prohibit the use of a single flow meter.

**44. Draft Condition 6.2.7**

**Comment:** The applicant notes, “DCMI should not have 1/12 of the annual fuel oil consumption limit as a monthly reporting value, since usage will likely all be within a one to three month period. The draft reporting value is about one week of operation. It is proposed that the reporting value be the rolling 12-month fuel oil usage limit of 1,000,000 gallons.”

**Response:** The permit has been revised accordingly and the notification requirement has been removed. Since fuel oil is generally used during curtailment, it is likely that DCMI could burn more than 1/12<sup>th</sup> of the annual limit in one month and still reasonably be expected to comply with the 12 month rolling limit. Condition Nos. 6.1.7b.iv and 6.2.8 remaining in the permit are sufficient to ensure compliance with the annual limit.

**45. Draft Condition 6.2.10**

**Comment:** The applicant notes, “Similar to comment for 6.2.2. See General Comments. We request that the assumption of zero efficiency during a temperature deviation be deleted in all conditions. For VOC this assumption conflicts with NSPS and EPA monitoring protocol guidance and this certainly should not be applied to oxidizer VOC performance.”

**Response:** The Division reviewed recently issued Title V permits with thermal oxidizers controlling VOCs including two existing automobile assembly plants. In addition, discussions with the author of the Auto/LDT Rule have indicated that the “zero efficiency” may be removed from the rule. As a result, the Division has changed the requirement to be consistent with the requirements of 40 CFR Part 60 Subpart MM.

**46. Draft Condition 6.2.21**

**Comment:** The applicant requests the “addition of British units alternate to the metric unit record keeping. We request that the assumption of zero efficiency during a temperature deviation

be deleted in this and all conditions.

**Response:** The permit has been revised accordingly and unit alternates have been added to Condition No. 6.2.21.

**47. Draft Condition 6.2.29**

**Comment:** The applicant requests “revision to clarify ‘startup’ of production to mean ‘startup of commercial vehicle production: or “first saleable commercial product’.”

**Response:** The permit has been revised so that notification is submitted appropriately for each start-up scenario. Subsections (a.) and (b.) remain as drafted. Subsections (e.), and (f.) have been changed to “initial startup of saleable vehicle surface coating production of light-duty trucks.” Subsections (c.) and (d.) has been changed to “initial startup of saleable vehicle surface coating production of medium-duty trucks.” These changes have been made based on the construction and startup schedules proposed by DCMI.

**48. Draft Condition 6.2.29g**

**Comment:** The applicant notes, “This certification requirement does not have a time requirement for providing certification that a final inspection has shown that construction has been completed in accordance with the application. We propose that this certification shall be furnished within 180 days after start-up of commercial vehicle production for a production line.”

**Response:** The Division has reviewed DCMI’s proposed language and agrees to change Condition No. 6.2.29 accordingly.

**49. Draft Condition 6.2.30**

**Comment:** The applicant requests “that this submittal (sample calculations for determination of conformance with paint shop limits) requirement be revised to ‘30 days prior to initial start-up of vehicle surface coating operations for saleable commercial product’.”

**Response:** The permit has been revised so that notification required by Condition No. 6.2.30 is submitted “30 days prior to initial startup of saleable vehicle surface coating production.”

**50. Major Source Equipment List**

**Comment:** The applicant notes “For Utilities/Hotwater Generators the stack ID block identifies one stack, U1. The application identified that there are two alternative designs; a single stack design, U-01; and a four stack design, U-01, U-02, U-03 and U-04. The preliminary air quality assessment evaluated potential impact of both designs, and final modeling inputs used the higher impact design parameters.”

**Response:** An explanation that the exhaust from the Hot Water Generators may be routed through anywhere between 1 and 5 stacks has been added to the major source equipment list.

## Review of EPA Comments

**51. Application Volume I, Comment #1**

**Comment:** EPA notes, “Page 6-4 includes a discussion of volatile organic compounds (VOC) emissions from Glazing and the Underbody Wax in the Assembly Shop. The applicant does not address whether there are lower emitting VOC content materials available in lieu of the proposed glazes and sealers.”

**Response:** DCMI has submitted revised sections 6.3.1 and 6.3.2 of Volume I of the application to address this issue.

**52. Application Volume I, Comment #2**

**Comment:** EPA notes, “Page 7-2 refers to several emission units as ‘Miscellaneous Exempt VOC Sources.’ While these emission units may be insignificant activities for title V permitting/minor source construction permitting purposes, their emissions are required to be included in the BACT analysis and the total facilitywide cap for VOC emissions.”

**Response:** DCMI has submitted a revised section 7.1.6 of Volume I of the application, which includes a BACT analysis for miscellaneous VOC sources. The Division has reviewed this analysis and determined that no additional permit requirements are necessary. VOC emissions from these miscellaneous VOC sources will be included in the facility-wide VOC emissions when determining compliance with Condition No. 2.1.1.

**53. Application Volume II, Section 7, BACT Feasibility Analysis**

**Comment:** EPA notes, “On page 7-3, Step 4, the applicant has performed an economic analysis for add-on controls at clearcoat spray zones and monocoat/basecoat heated flash zones. This analysis incorporates a seven-year cost recovery period based on the lifetime of items that are generally included in the operating cost of pollution control equipment. Cost recovery is a concept that is applied strictly to capital investments. In this instance, a capital investment would be the entire installation of add-on VOC abatement control equipment. The periodic replacement of system components because of wear and tear is considered as replacement material and is a portion of the annual operating cost that does not affect the capital recovery period of the system installation (see Chapter 2.5.5.6 Replacement Materials of the EPA document entitled “EPA Air Pollution Control Cost Manual – Sixth Edition (EPA 452/B-02-001)). The Region requests that you reevaluate the BACT analysis using a lifetime of no less than 10 years for capital recovery costs.”

**Response:** DCMI’s economic analysis does not include replacement system components. The seven year cost recovery period is based on the expected life of the thermal oxidizer, for which DCMI has submitted supporting information. However, DCMI did re-calculate the cost analysis based on a ten year cost recovery period as requested by EPA. The resulting cost effectiveness for add-on control technology for the flash zones is \$16,521 per ton of VOC reduced, which is above what is normally considered cost-effective for BACT.

**54. Draft Permit, Comment #1**

**Comment:** EPA notes, “For certain operations, the applicant rejected add-on controls for VOC based on economic considerations associated with the production plan. Specifically, the applicant’s production plan is to coat 50 percent of light-duty trucks (LDT) and 80 percent of medium-duty trucks (MDT) with monocoat versus the standard basecoat/clearcoat process. Based on these production plans, the Region believes that it is appropriate for the Georgia Environmental Protection Division (EPD) to include permit requirements that reflect the assumptions used to justify the rejection of add-on controls for VOC BACT on the heated flash zones and automated clearcoat spraying operations in the topcoat oven. Therefore, if EPD desires to allow the facility to construct without add-on controls based on the novel use of pollution prevention (the monocoat process), it should insist that all assumptions used in formulating BACT are included in the permit. In that way, should the stated plan to coat with monocoat not materialize, the State may require the facility to perform an updated VOC BACT analysis which may require the installation of add-on VOC controls for the clearcoat automatic zones and the basecoat/clearcoat flashoff areas. One approach that the State may use to achieve this end is to add the following language to the permit.

‘Should the facility not apply monocoat process at or near the stated ratio of 50 percent of all LDTs and 80 percent of MDTs manufactured, EPD may require the facility to re-analyze the VOC BACT limits for the basecoat/clearcoat operation.’

As an adjunct to this condition, EPD may want to include a monitoring requirement that requires the facility to track what percentage of LDTs and MDTs that it coats with the monocoat process on a 12-month rolling average basis.”

**Response:** The facility-wide limit on VOC emissions contained in the proposed permit achieves the same result as a limit on the ratio of vehicle coated with the monocoat process. The facility will not be able to comply with the proposed plant-wide VOC limit if the percentage of vehicles receiving the monocoat treatment is significantly decreased. DCMI has submitted an analysis assuming 100 percent basecoat/clearcoat utilization which illustrates this point.

**55. Draft Permit, Comment #2**

**Comment:** EPA notes, “The Region suggests that EPD may want to include a permit condition that requires ultra-low sulfur diesel be the allowed backup fuel oil as of June 2007. EPD has included this requirement in other permits that it has recently issued.”

**Response:** The proposed DCMI facility is not triggering PSD review for sulfur dioxide, therefore there is no legal basis to require the use of ultra-low sulfur diesel as a backup fuel. The recent permits issued by EPD that included the requirement for ultra-low sulfur diesel, were issued to facilities that triggered PSD review for SO<sub>2</sub> emissions.

**56. Draft Permit, Comment #3**

**Comment:** EPA notes, “The region suggests that EPD may consider placing a 12-month production target in the permit above which a permit reopening may be triggered to re-evaluate the BACT analysis in the event that production greatly exceeds the proposed annual production plans.”

**Response:** The facility-wide limit on VOC emissions contained in the proposed permit achieves the same result as a 12-month production target. The facility will not be able to comply with the proposed plant-wide VOC limit if the number of vehicles exceeds the proposed annual production plans.

**57. Draft Permit, Comment #4**

**Comment:** EPA notes, "Permit Condition 3.5.2 requires that the permittee is required to operate the air pollutant capture system serving the control system in such a way that the capture efficiency demonstrated in the most recently Division-approved performance test is achieved. There do not appear to be specific conditions in the permit that the facility could use to ensure that the demonstrated capture efficiency is achieved. EPD may want to consider requiring specific parameters such as air flow through spray booths and oven exhaust systems be tracked to validate that stated capture efficiencies are being achieved."

**Response:** Based on the proposed configuration of the ovens and thermal oxidizers, the capture efficiency of the thermal oxidizers is not likely to vary over time. The combustion air for the thermal oxidizers is obtained solely from air entering the ovens. Should the ovens exhibit positive pressure, insufficient oxygen would be available to the thermal oxidizers, resulting in deviations of the thermal oxidizer temperature. This in turn would adversely affect the oven performance because the heat from the thermal oxidizer exhaust is recovered and used to heat the ovens. Furthermore, because of the relatively low face velocity at the oven entrance and exit, traditional capture efficiency parameter monitoring, such as velocity pressure, is not applicable to the proposed facility.

The following comments were received in a meeting with DDCMI on May 14, 2003

**58. Draft Condition No. 3.1.21**

**Comment:** The applicant requests 250 hours of emergency generator operation on the basis that NSR say 500 hours is exempt.

**Response:** The permit has been revised accordingly.

**59. Draft Condition Nos. 3.2.1 and 3.4.7**

**Comment:** The applicant notes that these conditions are identical and requests that one be deleted.

**Response:** Condition 3.4.7 has been removed.

**60. Draft Condition 7.1.3c**

**Comment:** The applicant requests changing the wording of the sentence in the last paragraph to "...if organic HAP emissions exceed the emission limits in (a.) through (c.) of this condition..."

**Response:** The permit has been revised accordingly.

Other Changes

**Draft Condition No. 3.1.2** was changed by dropping the specific citation of ASTM D1835-86 and

replacing it with the more general nomenclature of ASTM D1835.

**Draft Condition No. 4.3.1** was changed, by replacing “vehicle production rate” with “maximum firing rate.”

**Draft Condition No. 4.3.2 and 4.3.3** were changed, by replacing “maximum vehicle production rate” with “maximum saleable vehicle production rate,” and replacing “startup of vehicle production” with “start-up of saleable vehicle surface coating operations.”

**Draft Condition No. 5.3.1** was changed from the “average combustion chamber temperature” to “the combustion chamber temperature,” and “is less than 1,400°F or the temperature” was change to “is less than 1,400°F or greater than 50°F below the temperature.”

**Draft Condition No. 5.3.2** citation “PSD” was changed to “40 CFR Part 52.21.”

**Draft Condition No. 6.1.7(b)v** was changed by correcting the referenced Condition No. “3.3.1” to “3.1.3.”

**Draft Condition No. 6.2.2** was changed from “Division report to the Division” to “Permittee report to the Division.”

**Draft Condition No. 6.2.6** was changed from “Division report to the Division” to “Permittee report to the Division.”

**Draft Condition No. 6.2.11** was changed to include the assumed 100% capture and 100% transfer efficiency of the E-coat dip tank and the E-coat drying oven.

**Draft Condition No. 6.2.29** was changed from “initiation of operation for any purpose” to “setting in operation of an affected facility for any purpose.”

APPENDIX A  
FINAL PSD PERMIT

APPENDIX B  
COMMENTS ON DRAFT PERMIT