Emission Summary

Permit Number: 981829

Source Status: New☒ Modification☐ Expansion☐ Relocation☐ **Permit Status:** New☒ Renewal☐

PSD☐ NSPS☒ NESHAPs☒ **Previous Permit Number:** Construction _____ Operating _____

	Pounds/Hour			Tons/Year				Date of Data	*	Applicable Standard 1200-03-
	Actual	Potential	Allowable	Actual	Potential	Allowable	Net Change			
Source 01 - E Coat Line Operation										
PM		0.31	10.3		1.36	45.1		10/2/23	1	07-.04(1)
SO_2		0.02	0.02		0.1	0.1		10/2/23	1	14-.03(5)
CO		3.46			15.2	15.2		10/2/23	1	07-.07(2)
NO_X**		1.60			7.0	7.0		10/2/23	1	07-.07(2)
VOC		14.22			63.0	63.0		10/2/23	1	
Source 02 – Two Boilers										
PM		0.19	9.0		0.8	39.4		10/2/23	1	06-.02(2)(a)
SO_2		0.01	125.0		0.06	547.5		10/2/23	1	14-.02(2)(a)
CO		2.06			9.0	9.1		10/2/23	1	06-.03(2)
NO_X**		2.20			9.6	9.7		10/2/23	1	06-.03(2)
VOC		0.13			0.6	0.6		10/2/23	1	06-.03(2)

* - Source of data

**NOx emissions for the curing ovens and boilers are based on emission factors provided by the manufacturer in the application dated October 2, 2023.

PERMITTING PROGRAM: SK DATE: January 25, 2024

CONSTRUCTION PERMIT SUMMARY REPORT

Company Name: Magna Structures Tennessee LLC File Number: 38-0177 EPS Initials: SK

Permit Number(s): 981829 Source Point Number(s): -01,02

Application Received (date): 10/02/2023 Application Complete (date): 10/17/2023

Air Quality Analysis Performed? Yes☐ No☒

Briefly describe the project: (new source, modifications) (what the process is) (type controls proposed) (emissions expected, qualitative) (replacing what sources) (background information)

This is a new construction permit for a Manufacturing facility that assembles and E-coats automobile frames, battery trays, and battery covers. The facility is located in Stanton and will be a true minor facility.

This construction permit is for one electrocoating (E-coat) line for automobile frames and battery enclosures, consisting of several pretreatment tanks, one E-Coat dip tank, and two natural gas-fired curing ovens (21 MMBtu/hr each). Two natural gas-fired boilers (12.5 MMBtu/hr each) are used to provide steam or hot water to the E-Coat line. The facility will also include welding operations, emergency generators and a fire pump engine, two cooling towers and multiple natural gas-fired rooftop units. .

The expected emissions from this source are PM, SO_2, CO, VOC, NO_x. Pollution control equipment is not proposed for this source.

This manufacturing facility will be located on the Blue Oval City property owned by Ford Motor Company, Ford Motor Company (38-0167) is in the process of constructing a large automobile manufacturing facility and lithium-ion battery manufacturing facility at the site. The automobile manufacturing facility is a PSD major source for emissions of $PM/PM_{10}/PM_{2.5}$, NO_X, CO, VOC, and GHG (as CO_2e). As such, the addition of the Magna Structures Tennessee facility to the site requires review to determine if the two facilities should be considered one for New Source Review permitting purposes. Under the NSR permitting program, there are three criteria for determining if entities should be considered part of the same stationary source, (1) if they belong to the same industrial grouping (major SIC code); (2) are located on one or more contiguous or adjacent properties; and (3) are under the control of the same person (or persons under common control).

Magna has indicated (in the email response dated November 14, 2023, from Caleb Rose) that Magna's primary product will support Ford's operations, and while the major SIC grouping may not be the same for both facilities, the Magna facility could be considered a support facility for Ford. Because the Magna facility will be located on the Blue Oval City site, the facilities are located on contiguous or adjacent properties. However, Ford and Magna are owned by separate corporations. Magna International Inc., the parent company of Magna Seating Tennessee LLC, is a Canadian corporation based in Ontario, Canada. As the facilities are owned by separate corporations, it is presumed that Magna will maintain all control and authority over such operations that could affect the applicability of, or compliance with, permitting requirements at the Magna facility. Therefore, the two facilities are not under common control, and would be considered separate stationary sources for NSR permitting.

The proposed Magna Structures operation will be an area source of HAP emissions. The pretreatment process associated with the E-coat line is potentially subject to 40 CFR 63, Subpart WWWWWW – *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations* (Subpart WWWWWW), as one or more tanks may be considered a non-electrolytic metal coating process that uses or has emissions of one or more metal plating HAP. At the time of application, the facility had not decided what materials would be used in the tanks. Therefore, the requirements of Subpart WWWWWW were included in the permit. Once the facility determines the materials to be used, the process will be reevaluated for Subpart WWWWWW applicability.

Dip coating of metal parts is not subject to 40 CFR 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (Subpart HHHHHH), as Subpart HHHHHH applies to spray-applied coating operations.

Certain metal fabrication operations are potentially subject to 40 CFR 63, Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabricating and Finishing Source Categories* (Subpart XXXXXX). A review of examples of regulated entities in Table 1 in the preamble to Subpart XXXXXX indicates that this type of manufacturing process is not subject to the requirements of Subpart XXXXXX. Additionally, a review of the SIC and NAICS code listing provided by EPA indicates that facilities in the major SIC grouping of 37 (such as 3714, motor vehicle

parts and accessories) are not subject, as none of the SIC codes identified by EPA are in major group 37. Therefore, the proposed Magna Structures facility is not subject to Subpart XXXXXX.

The two natural gas-fired boilers (12.5 MMBtu/hr each) are subject to 40 CFR 60, Subpart Dc – *Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units*. These units are not equipped with low-NO_X burners, however, the vendor-supplied emission factors for NO_X indicate that potential emissions of NO_X from each boiler will be less than 5.0 tons per year, therefore they are not subject to the low-NO_X burner policy. The large curing ovens (22.5 MMBtu/hr each) are equipped with low-NO_X burners.

Rules Analysis

Title V☐ Cond. Major☐ Minor☒ Source category listed in 1200-03-09-.01(4)(b)1(i)? Yes☐ No☒

Reason for PSD:	New source above ____ TPY	☐	Sig. increase in ____ emissions	☐	N/A	☒
Applicable NSPS:	40 CFR Part 60, Subpart Dc	☒	State Rule 1200-03-16-.	☐	N/A	☒
Applicable NESHAP:	40 CFR Part 60, Subpart	☐	State Rule 1200-03-11-.	☐	N/A	☒
Applicable NESHAP:	40 CFR Part 63, Subpart 6W	☒	State Rule 1200-03-31-.	☐	N/A	☒
Applicable NESHAP:	40 CFR Part 63, Subpart	☐	State Rule 1200-03-31-.	☐	N/A	☒

Other Applicable State Rules

						NO_x Emissions:	1200-03- 07 -. 07(2)	☒	N/A	☐
PM Emissions:	1200-03- 07 -. 04(1)	☒	N/A	☐		_____ Emissions:	1200-03- ____ -. ____	☐	N/A	☐
SO_2 Emissions:	1200-03- 14 -. 03(5)	☒	N/A	☐		_____ Emissions:	1200-03- ____ -. ____	☐	N/A	☐
CO Emissions:	1200-03- 07 -. 07(2)	☒	N/A	☐		_____ Emissions:	1200-03- ____ -. ____	☐	N/A	☐
VOC Emissions:	1200-03- 07 -. 07(2)	☒	N/A	☐		_____ Emissions:	1200-03- ____ -. ____	☐	N/A	☐

Visible Emissions from	Source 01, 02	not to exceed	20	% opacity per Method	9	(Rule 1200-03- 05 -. 03(6))
Visible Emissions from		not to exceed		% opacity per Method	9	(Rule 1200-03- 05 -. 01(1))
Visible Emissions from		not to exceed		% opacity per Method		(Rule 1200-03- ____ -. ____)

Comments: _____