UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 30 2014

REPLY TO THE ATTENTION OF

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft Prevention of Significant Deterioration (PSD) permit, permit number 157-33759-00050, for Subaru of Indiana Automotive, Inc, located in Lafayette, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. The facility description in Section D.3 lists three scenarios for plastic bumper coating operations for the new Paint Line C. Scenario 1 involves the conversion of an existing plastic fascia paint line system (PFPLS#2) to the production of painted plastic bumpers for Paint Line C. Scenario 2 involves increasing capacity at an existing line while not installing new plastic bumper line in Paint Line C. According to permit condition D.3.1, the existing PFPLS#2 line uses a thermal oxidizer to control Volatile Organic Compounds (VOC) emissions. However, the post-modification line will no longer include this control device and add-on controls for VOC Best Available Control Technology (BACT) were determined to be not cost effective. Please explain why continued use of the existing thermal oxidizer for scenarios 1 and 2 was not considered feasible for BACT.

2. The proposed VOC BACT limit for the topcoat system is 10.96 pounds per gallon applied coating solids (lb/gacs) under Option A and 10.41 lb/gacs for topcoat and intermediate surfacer combined under Option B. These limits are significantly higher than VOC BACT emission limits from other sources listed under the topcoat system BACT analysis. Several other sources listed in the BACT analysis require a thermal oxidizer at topcoat booths and ovens as well as other parts of their paint line while the draft Subaru permit requires a thermal oxidizer only for the topcoat oven. In addition, the BACT determination for at least one recent automobile assembly plant (Volkswagen Group of America in Chattanooga, Tennessee), which includes low VOC content materials, was not included for comparison in the BACT analysis. Since many other

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recent PSD permits required lower emission rates and add-on controls, the permit should explain what distinguishes Paint Line C from other sources where lower limits were found to be feasible.

3. Permit condition D.9.2 limits Particulate Matter (PM) emissions for all units involved in this project to less than 25 tons per 12 consecutive month period of total PM, less than 15 tons per 12 consecutive month period of PM_{10}, and less than 10 tons per 12 consecutive month period of $PM_{2.5}$ so that PSD requirements do not apply for these pollutants. Compliance with these limits is to be determined using the equation in permit condition D.9.3. One component of this equation is the solids Transfer Efficiency (TE) of the applicator for each booth. According to the permit condition, the TE is to be based on TE determination tests. However, testing is not required in the permit to determine transfer efficiency. Please clarify how TE is to be determined.

4. Section E.1 of the permit lists all units at the facility (both existing and new as of this permitting action) that are subject to 40 C.F.R. Part 63, Subpart IIII. Permit condition E.1.4 lists the sections of Subpart IIII that are applicable to Subaru, but does not specify which sections apply to which units. For example, 40 C.F.R. 63.3090 (for new or reconstructed affected sources) and 40 C.F.R. 63.3091 (for existing affected sources) are listed as applicable provisions. However, it is not clear from the permit conditions which section applies to which units. The permit should provide more clarity as to which requirements of Subpart IIII apply to the various units at the source.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,

Genevieve Damico

Genevieve Damico
Chief
Air Permits Section