

Page 1 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Permit Writer	Michael Enting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.		

There is a Confidential Statement of Basis for this facility

DATE APPLICATION RECEIVED:March 28, 2024DATE OF LAST INSPECTION:April 20, 2023

The facility was found to be in violation of permit condition C.15 and E.5 for failing to conduct tune-ups for the boilers in the required time frame. The BAQ decided to issue a No Further Action (NFA) as the resolution for this violation.

PROJECT DESCRIPTION

The facility is requesting renewal of their Title V Operating Permit. During this renewal, Equipment ID EV14-LINE2-4 has been updated to account for four EV14 lines, rather than three. This was an error in the permit from the Title V Renewal issued on December 11, 2012, which incorporated 0900-0020-DK. In the 2012 renewal, PTE was updated for the fourth EV14 line, but the ID was not updated.

FACILITY DESCRIPTION

SIC CODE: 3714, Motor Vehicle Parts and Accessories

NAICS CODE: 336310, Motor Vehicle Gasoline Engine and Engine Parts Manufacturing & 336340, Motor Vehicle Brake System Manufacturing

Robert Bosch LLC (Bosch) operates an automotive parts manufacturing and assembly facility in North Charleston, SC. The Bosch facility manufactures gasoline fuel injectors, gasoline fuel pumps, and anti-lock braking systems for the automotive industry. Major manufacturing operations at Bosch include assembly, welding, auditing, endurance testing, machining, and chrome plating. Bosch also operates natural gas/No. 2 fuel oil-fired boilers.

CHANGES SINCE LAST OP ISSUANCE

The following changes have been made since the last Title V Operating Permit was issued (August 29, 2019):

- 1. <u>June 8, 2020</u> Installation of fans in Building 102 to service the affected equipment. Modeled pollutant emission rates are not adversely impacted.
- 2. June 8, 2020 Voluntary control device, VARA, was removed from Building 101. As VARA was not a mandatory control device, previous air permit submittals did not account for any VOC destruction or control from the device; therefore, modeled pollutant emission rates are not adversely impacted by its removal.
- 3. July 14, 2020 Start of construction notification for construction permit 0900-0020-DP was received for Equipment ID ESP / IPB MACH.
- 4. <u>November 16, 2020</u> Equipment located in Building 101C near column V7 was relocated to Building 104 column C6. The equipment has an exhaust fan and is used to support ESP/ABS production. As the equipment was only relocated, the throughput and emissions did not increase.
- 5. <u>May 3, 2021</u> All equipment and activities associated with the production of the nozzle product were shut down. The equipment removed from the site were the following insignificant activities: NOZZLEASSEM, NOZZLEEND, NOZZLECOAT, NOZZLEMACH, NOZZLEWASH, and NOZZLESHOTB.



Page 2 of 11 BAQ Air Permitting Division

Company Name:Robert Bosch LLCPermit Writer:Michael EptingAgency Air Number:0900-0020Date:DRAFTPermit Number:TV-0900-0020 v2.0DRAFT

- 6. <u>May 3, 2021</u> One washer from the nozzle line was relocated from Building 201 to the EV14 product area located in Building 102B. The washer relocation did not change the output of parts, wash chemical usage, or emission rates.
- <u>February 3, 2022</u> Initial startup notification was received for construction permit 0900-0020-DP. Also, Form D-2949 (Minor Permit Modification) was included for a minor modification to incorporate some of the permitted and exempt sources described in construction permit 0900-0020-DP into the TV Permit.
- 8. <u>April 29, 2022</u> All equipment and activities associated with the machining of CRIN injectors were shut down as of March 1, 2022. The equipment removed from the site was the following insignificant activity: CRINMACH.
- 9. <u>April 29, 2022</u> Emergency Generator EMERG3 was replaced with a new Emergency Generator. Emergency Generator was evaluated and determined to be exempt from coverage under an air construction permit due to kilowatt hour rating and use as an emergency unit only.
- 10. <u>March 28, 2022</u> Withdrawal of Minor Permit Modification application received February 3, 2022 as the changes resulting from the start of operation for Equipment ID ESP / IPB MACH had already been incorporated into the Title V Permit via a 502(b)(10) modification.
- 11. <u>October 26, 2022</u> All equipment and activities associated with the Vetro Chrome Plating Line were shut down. The equipment CPL3 and the control device TSDS were removed from the site. The emission point E2BR2 will no longer be used.
- 12. <u>October 26, 2022</u> Addition of Separate Motor Generator (SMG) equipment related to the production and assembly of Rivian stators and rotors for electric vehicles. The Stator and Rotor Production equipment began installation between July-August 2022. The equipment began operating in September 2022. All equipment found to have no emissions or be an insignificant activity. Please see 2022-10-26_0900-0020.OSIL for more information.
- 13. <u>April 27, 2023</u> Additional trickling station (SSL) installed for resin application on to the stator for Separate Motor Generator (SMG) production of Rivian units.
- 14. <u>April 27, 2023</u> The ALD furnace was removed from the site. This equipment was part of Heat Treat (HEAT) and an insignificant activity. The removal of this equipment was due to the shutdown and relocation of the diesel common rail product from the Charleston site to other Bosch locations.
- 15. <u>April 27, 2023</u> A new central machining system (IA-EV14MACH) was installed in Building 101A. The new system uses the same filter media and machining fluid as the original system. The original system has been idled and isolated. Bosch has begun the internal process to have this equipment removed from the site.
- 16. <u>April 27, 2023</u> The Common Rail Injector Endurance bench (CRINEND) was removed from the site. Removal of this insignificant activity equipment was due to the shut down and relocation of diesel common rain product from the Charleston site to other Bosch locations.



BAQ Air Permitting Division

Page 3 of 11

Company Name:Robert Bosch LLCPermit Writer:Michael EptingAgency Air Number:0900-0020Date:DRAFTPermit Number:TV-0900-0020 v2.0DRAFT

- 17. <u>October 19, 2023</u> Three washers in the EV14 Honing-Grinding area were replaced with three new washers. This equipment is on the Insignificant Activities list for EV Wash. The washer replacement did not change throughput or emissions.
- 18. <u>October 19, 2023</u> Four ESP 9 Grob machining centers were removed from the site. This equipment, ABSMACH, is on the Insignificant Activity List. The removal of the machining centers will not change the output of parts or emissions produced by the remaining ABSMACH equipment.
- 19. <u>April 27, 2024</u> The existing stack for an oily mist collector/filtration system in ABS/ESP9 machining was moved 20 feet. This equipment is on the Insignificant Activities List. This move was done to make room for new equipment (ESP10) to be installed at a later date.
- 20. June 3, 2024 Addition of Separate Motor Generator (SMG) equipment related to the production and assembly of Stellantis stators and rotors for electric vehicles. The Stator and Rotor Production equipment began installation between July-August 2022. The equipment began operating in October 2023. All equipment found to have no emissions or be an insignificant activity. Please refer to ePermitting document (OSIL Oct1 2023_Mar31 2024.pdf) for more information.
- 21. June 3, 2024 Additional mist collector/filter was installed as part of ESP9 and IPB machining chip collection, CHIP. This equipment is on the Insignificant Activities List. This modification was completed for industrial hygiene purposes and to improve chip recycling. The addition of this equipment does not change the output of parts or emissions.
- 22. June 3, 2024 An assembly line for ESP9 assembly operations was removed from the site. This equipment is on the Insignificant Activities List as part of ESPASSEM. The removal of this equipment does not change the output of parts or emissions.
- 23. June 3, 2024 Addition of electrically powered SECO heat treating furnace was placed into operation as a replacement for a previously removed ALD furnace. This equipment is on the Insignificant Activities List as part of HEAT. Replacement of the older ALD furnace with the newer SECO furnace does not trigger new regulations, standards, or requirements and does not increase emissions.
- 24. June 3, 2024 Addition of 100 kilowatt-hr Emergency Generator, EMERG6, fired by diesel fuel. Installed to support the addition of new servers to be installed in 2024 in Building 104. Emergency Generator was evaluated and determined to be exempt from coverage under an air construction permit due to kilowatt hour rating and use as an emergency unit only.
- 25. <u>August 21, 2024</u> Machining equipment for ESP10 operations was installed to replace machining centers that were removed for ESP9 machining. This equipment is on the Insignificant Activities List. Average production of ESP10 is expected to be the same as ESP9. Maximum production of ESP10 is also estimated to be the same as ESP9.



Page 4 of 11

BAQ Air Permitting Division

Company Name: Agency Air Number:	Robert Bosch LLC 0900-0020	Permit Writer:	Michael Epting	
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFI	

26. <u>September 21, 2024</u> – Two ESP 9 Grob machining centers were removed from the site. This equipment, ABSMACH, is on the Insignificant Activity List. The removal of the machining centers will not change the output of parts or emissions produced by the remaining ABSMACH equipment.

VOID EQUIPMENT

The following emission units/equipment have been deemed VOID and will be removed from the current operating permit. A comprehensive record of voided equipment for the site can be found in ePermitting under Program Components.

Emission Unit ID	EU Description	Equipment ID	Equipment Description	Reason for VOID Status	Date Removed
03	Chrome Plating Lines	CPL3	Vetro Chrome Plating Line No. 3	Removed from facility	2022

Emission Unit ID	EU Description	Control Device ID	Control Device Description	Reason for VOID Status	Date Removed
03	Chrome Plating Lines	CD- TSDS	100% Capture Two Stage Dry Scrubber	Removed from facility	2022

EMISSIONS

Assumptions and Basis for PTE:

- 1. For permitted source combustion, BR5-2013 and BR6, the worst-case emissions were calculated for 8,760 hours. For PM, PM₁₀, SO₂, NOx, and Pb, No. 2 Fuel Oil was used to calculate emissions. For PM_{2.5}, CO, and VOC, natural gas was used to calculate emissions.
- 2. For insignificant activity combustion, emergency generators and emergency pumps, PTE emissions were calculated for 500 hours using Diesel fuel.
- 3. Reported particulate matter emissions as PM, PM₁₀, and PM_{2.5} for most conservative estimate.
- 4. CD-CR SCRUB is assumed to have a control efficiency of 99%. CD-CR SCRUB allows Bosch to meet 40 CFR 63 Subpart N chromium emission requirements. As such, the control device efficiency is only used to estimate uncontrolled PM and chromium emissions, which are both well below major thresholds and have been modeled.
- 5. CD-CPL4 has a control efficiency of 99.97% for pollutants down to the size of 0.3 microns, per manufacturer's specifications; however, a control efficiency of 99% is used in the calculations to conservatively estimate emissions.



Page 5 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Permit Writer	Michael Enting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFT	

FACILITY WIDE EMISSIONS					
Dollutant1	Uncontrolled	Controlled	PTE		
Pollutant	ТРҮ	ТРҮ	ТРҮ		
PM	15.46	15.19	15.46		
PM ₁₀	14.30	14.02	14.30		
PM _{2.5}	14.30	14.02	14.30		
SO ₂	21.27	-	21.27		
NO _x	39.19	-	39.19		
СО	12.16	-	12.16		
VOC	230	-	< 250.0		
Lead (Pb)	8.89E-04	-	8.89E-04		
Cr+6 (H, T) (CAS# 7440-47-3)	0.17	4.74E-03	0.17		
Mn (H, T) (CAS# 7439-96-5)	5.07E-03		5.07E-03		
Ni (H, T) (CAS# 7440-02-0)	5.12E-04		5.12E-04		
Benzene (H, T, V) (CAS# 71-43-2)	0.172	-	0.172		
Cumene (H, T, V) (CAS# 98-82-8)	0.345	•	0.345		
Ethanolamine (H, T) (CAS# 141-43-5)	0.36	-	0.36		
Ethyl Benzene (H, T, V) (CAS# 100-41-4)	0.69	-	0.69		
Hexane (H, T, V) (CAS# 110-54-3)	0.86	-	0.86		
Hydrazine (H, T, V) (CAS# 302-01-2)	1.85E-08	-	1.85E-08		
Methanol (H, T, V) (CAS# 67-56-1)	8.32E-04	-	8.32E-04		
Methyl Tert-Butyl Ether (H, T, V) (CAS# 1634-04-4)	0.345	-	0.345		
Naphthalene (H, T, V) (CAS# 91-20-3)	0.345	-	0.345		
Sodium Hydroxide (T) (CAS# 1310-73-2)	0.023	-	0.023		
Sulfuric Acid (T) (CAS# 7664-93-9)	0.074	-	0.074		
Toluene (H, T, V) (CAS# 108-88-3) Highest HAP	1.03	-	1.03		



STATEMENT OF BASIS Page 6 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Permit Writer	Michael Enting
Agency Air Number:	0900-0020	Date:	
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFT

FACILITY WIDE EMISSIONS					
Pollutant ¹	Uncontrolled	Controlled	PTE		
Pollutant	ТРҮ	ТРҮ	ТРҮ		
2,2,4-Trimethylpentane (H, T, V) (CAS# 540-84-1)	1.41E-02	-	1.41E-02		
Xylene (H, T, V) (CAS# 1330-20-7)	0.69	-	0.69		
Total HAPs	5.03	4.86	5.03		

¹*H*=*HAP*, *T*=*TAP*, *V*=*VOC*

REGULATIONS

Applicable - Section II(E) (Synthetic Minor)

The facility has established federally enforceable limits of < 250.0 TPY to remain a minor source for PSD. One algorithm for calculating VOC emissions involves the use of collecting the waste material from the process. The facility has confirmed that the waste is not a mixed waste and that it is shipped off-site after collection.

Synthetic Minor Limits					
Permit ID	Equipment ID	Permit Issue Date	Pollutant	Emission Limit (TPY)	Explanation
0900-0020- DO	Facility- Wide	August 2, 2016	VOC	< 250.0	PSD Avoidance

Applicable - Standard No. 1 (Emissions from Fuel Burning Operations)

The boilers meet the definition of indirect fuel burning as outlined in SC Regulation 61-62.1, Section I (31). As such, these sources are subject to an opacity limit of 20%, as well as PM and SO₂ limits.

	PM Allowable	SO ₂ Allowable	Uncontrolled Emissions		Controlled	Emissions
	(lb/hr)	(lb/hr)	PM (lb/hr)	SO ₂ (lb/hr)	PM (lb/hr)	SO ₂ (lb/hr)
BR5-2013	7.53	28.9	0.30	2.55	-	-
BR6	5.99	23.0	0.24	2.03	-	-

Not Applicable - Standard No. 3 (state only) (Waste Combustion and Reduction)

This facility does not contain waste combustion or reduction sources.

Applicable - Standard No. 4 (Emissions from Process Industries)

This facility has the following sources subject to the opacity limit of 20% in Section IX: EV14-LINE2-4, EVAUDIT, CPL1-2, CPL4, WWT, HDEV-Assembly/Audit, and HDP-Assembly/Audit. This facility has the following source subject to the opacity limit of 40% in Section IX: EVEND. Sources 02 and 03 are subject to the PM limits in Section VIII of this standard.



STATEMENT OF BASIS Page 7 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Bormit Writor:	Michael Enting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.	DIALI	

Process	Max Process Weight Rate (tons/hr)	PM Allowable at Max (lb/hr)	Uncontrolled Emissions PM (lb/hr)	Controlled Emissions PM (lb/hr)	Monitoring
02 (EV14- LINE2-4, EVAUDIT, EVEND)	Confidential	Confidential	3.12E-03	-	Operating the process at or below the equipment's
03 (CPL1-2)	Confidential	Confidential	3.57E-03	3.57E-05	maximum process
03 (CPL4)	Confidential	Confidential	0.059	5.94E-04	weight rate

Not Applicable - Standard No. 5 (Volatile Organic Compounds)

This facility is not located in the exempt counties of Anderson, Bamberg, Barnwell, Chesterfield, Darlington, or Hampton. Although this facility has the potential to emit 100 TPY of VOC emissions, this facility is not an existing process as it was not in existence or under construction by July 1, 1979. As such, this standard does not apply.

Applicable - Standard No. 5.2 (Control of Oxides of Nitrogen (NOx))

This facility has two sources that emit NO_x from fuel combustion: BR5-2013 and BR6. BR5-2013 was constructed after June 25, 2004. This boiler has a rated input of 12.557 million BTU/hr and has an uncontrolled potential to emit greater than 5 tons per year of NOx; therefore, this boiler is subject to this standard. Per the manufacturer's specifications, BR5-2013 uses both a low NO_x burner and flue gas recirculation. BR6 was also constructed after June 25, 2004, however, it is rated at 9.99 million BTU/hr, so it is exempt from this standard.

The manufacturer of the low NO_x burner for BR5-2013, Webster Combustion, certifies a maximum emission rate of 0.03 and 0.115 lb NO_x per million BTU for natural gas and No. 2 fuel oil, respectively. Therefore, BR5-2013 is able to comply with this Standard.

Not Applicable - Standard No. 7 (Prevention of Significant Deterioration)

This facility has previously had uncontrolled emissions greater than 250.0 TPY for VOC. However, the facility has taken federally enforceable limits to remain a minor source for PSD.

Applicable - 61-62.6 (Control of Fugitive Particulate Matter)

The facility is subject to the state-wide requirements described under Section II of this standard.

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

Applicable – Subpart Dc *Small Industrial-Commercial-Institutional Steam Generating Units*, applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 100 million BTU/hr or less, but greater than or equal to 10 million BTU/hr. This facility has two boilers that were constructed after June 9, 1989; however, only BR5-2013 has a design heat input capacity greater than 10 million BTU/hr. As such, BR5-2013 is subject to this regulation.



STATEMENT OF BASIS Page 8 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Bormit Writer:	Michael Enting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFI	

BR5-2013 combusts a mixture of No. 2 fuel oil with other fuels not subject to a PM standard in this Subpart and does not use a post-combustion technology to reduce PM or SO₂, so it is not subject to the PM limit in this section. Since oil is combusted, BR5-2013 will be subject to standards for sulfur dioxide (SO₂).

Not Applicable – Subpart Kb Volatile Organic Liquid Storage Vessels, applies to each storage vessel with a capacity greater than or equal to 75 cubic meters (m³), 19,812.9 gallons, that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. There are currently 8 tanks at this facility which were constructed after July 23, 1984, and are used to store VOL: ST910, ST911, ST912, ST921, ST922, ST923, ST943, and ST946. However, each storage vessel has a capacity of less than 75 m³, so this regulation does not apply.

Not Applicable – Subpart MM Automobile and Light Duty Truck Surface Coating Operations, applies to each prime coat operation, each guide coat operation, and each topcoat operation at an automobile or light-duty truck assembly plant. This facility does not have any surface coating operations, so this regulation does not apply.

Not Applicable – Subpart TT *Metal Coil Surface Coating*, applies to metal coil surface coating operations including prime coat operations and finish coat operations. A metal coil is any continuous metal strip with thickness of 0.15 mm or more that is packaged in a roll or coil. Bosch does not use metal coil products in its operations. Additionally, none of the described affected facilities accurately describe the operations at this facility. As such, this regulation does not apply.

Applicable – Subpart IIII Stationary Compression Ignition Internal Combustion Engines, applies to the owner or operator of a stationary CI ICE that commenced construction after July 11, 2005. There are currently 6 emergency generators and 2 fire pumps at the facility: EMERG1, EMERG 2 EMERG3, EMERG4, EMERG5, EMERG6, FIREP105 and FIREP201. Of these, 3 engines were constructed after July 11, 2005. As such, EMERG3, EMERG5, and EMERG6 are subject to this regulation.

Not Applicable – Subpart JJJJ Stationary Spark Ignition Internal Combustion Engines, applies to the owner or operator of a stationary SI ICE that commenced construction after June 12, 2006. There are currently no emergency generators or fire pumps that are spark ignition, so this regulation does not apply.

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

Not Applicable - This facility does not emit the pollutants in a way that is subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).

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

<u>Applicable - Subpart N</u> Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, applies to each chromium electroplating or chromium anodizing tank at facilities performing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing. The facility has chrome plating operations to improve wear resistance and create a radial air gap for the functionality of the



Page 9 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Bormit Writor:	Michael Epting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFT	

injector. Based on this function of the chrome layer, the chrome plating lines are considered "hard chromium electroplating operations". As such, CPL1, CPL2, and CPL4 are subject to this regulation.

The facility is considered a small, hard chromium electroplating facility as it has a maximum cumulative potential rectifier capacity of less than 60 million amp-hr/yr. The applicability date of this Subpart is February 8, 2012. CPL1 and CPL2 are considered existing affected sources and CPL4 is considered a new affected source; therefore, these sources will be subject to different emission standards for Cr emissions.

Not Applicable – Subpart SSSS *Surface Coating of Metal Coil,* applies to each facility that is a major source of HAP, at which a coil coating line is operated. A metal coil is any continuous metal strip with thickness of 0.15 mm or more that is packaged in a roll of coil. As Bosch does not use metal coil products in its operations nor is it a major source of HAP, this regulation does not apply.

Applicable – Subpart ZZZ Stationary Reciprocating Combustion Engines (RICE), applies to stationary RICE at a major or area source of HAP emissions. Although the RICE at the facility meet the definition of an emergency stationary RICE outlined in §63.6675, this facility has both existing and new RICE. The existing emergency stationary RICE which were constructed before June 12, 2006, EMERG1, EMERG2, EMERG4, FIREP105 and FIREP 201, are subject to this regulation. The new emergency stationary RICE constructed after June 12, 2006, EMERG3, EMERG5, and EMERG6, are also subject to this regulation. As outlined in §63.6590(c), EMERG3, EMERG5, and EMERG6 comply with this standard by complying with 40 CFR 60 Subpart IIII.

Not Applicable – Subpart HHHHHH Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, applies to paint stripping operations that use chemical strippers that contain MeCl, autobody refinishing operations, and spray application of coatings containing Cr, Pb, Mn, Ni, or Cd. As Bosch is not involved in any of these activities, this regulation does not apply.

Applicable – Subpart JJJJJJ Industrial, Commercial, and Institutional Boilers Area Source, applies to all existing and new industrial, commercial, and institutional boilers at an area source for HAP emissions. BR5-2013 is a new boiler as construction commenced after June 4, 2010 and BR6 is an existing boiler as construction commenced on or before June 4, 2010. As both boilers are oil-fired, they are subject to this regulation.

BR5-2013 is not subject to the PM emission limit under this Subpart as the boiler only combusts ultra-low-sulfur liquid fuel.

Not Applicable – Subpart XXXXX Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, applies to an area source of HAP that is primarily engaged in the operations in one of the nine source categories listed in §63.11514(a). Bosch does not conduct any of the source category activities described in Table 1 of the Subpart, so this regulation does not apply.

Not Applicable - 61-62.68 (Chemical Accident Prevention Provisions)

This facility does not store or use chemicals subject to 112(r) above the threshold quantities.



STATEMENT OF BASIS Page 10 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Permit Writer:	Michael Enting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFI	

Not Applicable - 40 CFR 64 (Compliance Assurance Monitoring)

This facility operates two control devices on units that are subject to an emission limitation or standard, CD-CR SCRUB and CD-CPL4; however, these units do not have potential pre-control device emissions that are equal to or greater than 100 percent of the amount required for the source to be classified as a major source. As such, CAM does not apply.

AMBIENT AIR STANDARDS REVIEW

Applicable - Standard No. 2 (Ambient Air Quality Standards)

This facility has demonstrated compliance through modeling; see modeling summary dated June 21, 2019.

Applicable - Standard No. 8 (state only) (Toxic Air Pollutants)

This facility has demonstrated compliance through modeling; see modeling summary dated June 21, 2019.

PERIODIC MONITORING					
ID	Regulatory Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
Facility- Wide	S.C. Regulation 61- 62.1, Section II(E)	VOC Emissions	Monthly	Semiannual	Calculation of actual emissions for direct comparison to the limit.
01	S.C. Regulation 61- 62.5, Standard No. 1, Section I	Visual Inspection	Semiannual	Semiannual	Opacity not expected with natural gas. Fuel oil is a back-up fuel. Qualitative visual inspections shall suffice for monitoring.
02, 03	S.C. Regulation 61- 62.5, Standard No. 4, Section VIII	None	None	None	At the maximum PWR, uncontrolled emissions are below the Std 4 limit.
02, 03, 05, 06, 07	S.C. Regulation 61- 62.5, Standard No. 4, Section IX	Visual Inspection	Semiannual	Semiannual	Opacity is not expected and qualitative visual inspections shall suffice for monitoring.
BR5- 2013	S.C. Regulation 61- 62.5, Standard No. 5.2, Section III	NO _x Limit	None	On-Site	Manufacturer's certification has been provided to show compliance with the emission limits.



Page 11 of 11

BAQ Air Permitting Division

Company Name:	Robert Bosch LLC	Pormit Writor:	Michael Epting	
Agency Air Number:	0900-0020	Date:		
Permit Number:	TV-0900-0020 v2.0	Date.	DRAFI	

PERIODIC MONITORING					
ID	Regulatory Requirement	Measured Parameter	Required Monitoring Frequency	Reporting Frequency	Monitoring Basis/ Justification
BR5- 2013	S.C. Regulation 61- 62.5, Standard No. 5.2, Section IV	Amount and Type of Fuel Combusted	Monthly	On-Site	Required by regulation.
BR5- 2013	S.C. Regulation 61- 62.5, Standard No. 5.2, Section IV	Tune-Ups	Biennially	On-Site	Required by regulation.
BR5- 2013	40 CFR 60.42c(d) (NSPS Subpart Dc)	Amount and Type of Fuel Combusted	Monthly	Semiannual	Compliance with SO ₂ standard (< 0.5% weight sulfur).
03	40 CFR 63.347(h) (NESHAP Subpart N)	Control Device O & M	Daily	Semiannual	Compliance with Cr emission limits.
01	40 CFR 63.11225(c)(2)(iv) (NESHAP Subpart JJJJJJ)	Type of Fuel Combusted	Monthly	On-Site	Alternative for compliance with PM emission limit.
01	40 CFR 63.11225(b) (NESHAP Subpart JJJJJJ)	Tune-Up	Biennially	On-Site	Compliance with work practice and management practice standards.

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N) and SC Regulation 61-62.70.7(h).

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.