



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

7/10/2013

Certified Mail

Mr. Matthew Mesaros  
Ford Motor Company - Ohio Assembly Plant  
650 Miller Road  
Avon Lake, OH 44012

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0247030471  
Permit Number: P0104237  
Permit Type: Administrative Modification  
County: Lorain

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
Ohio EPA-NEDO; Canada



STAFF DETERMINATION FOR THE APPLICATION FOR A PLANTWIDE APPLICABILITY LIMIT (PAL)  
PERMIT FOR FORD MOTOR COMPANY'S OHIO ASSEMBLY PLANT LOCATED IN LORAIN COUNTY,  
OHIO

Facility ID 0247030471 Permit No. P0104237  
FEBRUARY 27, 2013

Introduction

The Clean Air Act and regulations promulgated thereunder allow for the use of an actuals Plantwide Applicability Limit (PAL) permit for any existing major stationary source provided the PAL meets the requirements contained in the PAL rule. The PAL imposes annual emission limitations in tons per year for the entire major stationary source. The PAL enables major stationary sources operational flexibility to make physical changes or changes in the method of operations provided that these changes do not increase total source-wide emissions above the permitted PAL level. A major modification under the PAL is any physical change or change in the method of operation of the PAL source that cause it to emit any PAL pollutant at a level greater than or equal to the PAL. Although the PAL allows for operational flexibility, major stationary sources permitted under a PAL must continue to comply with all applicable federal or state requirements, emission limitations, and work practice requirements that were established prior to the effective date of the PAL. Ohio has incorporated the PAL requirements by rule under OAC 3745-31-32 and currently has a program that is fully approved by the US EPA.

The principal requirements of the PAL regulations are:

- 1) Permit application requirements
- 2) General requirements for establishing PALs
- 3) Contents of the PAL permit

On December 16, 2008, Ford Motor Company's Ohio Assembly Plant (facility ID 0247030471) submitted a permit application for a PAL permit in accordance with OAC rule 3745-31-32 for VOC, particulate matter, and NO<sub>x</sub> emissions. The December 16, 2008, application was supplemented with an application submitted on April 22, 2009, for a PAL permit for CO and SO<sub>2</sub> emissions and, again, on January 23, 2013, for a PAL permit for greenhouse gas emissions.

Site Description

The Ford Motor Company's Ohio Assembly Plant is an existing facility located in Avon Lake, Ohio, in Lorain County. It is a major source of OC/VOC, NO<sub>x</sub>, SO<sub>2</sub>, CO, particulate matter, and HAP emissions. Lorain County is in attainment of the NAAQS for PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, CO, ozone, and lead. Lorain County is classified as non-attainment for PM<sub>2.5</sub>.

Facility Description

The Ford Motor Company's Ohio Assembly Plant currently assembles Econoline vans. The manufacturing process includes assembly of body and interior parts, coating and painting, and final assembly when interior components are installed.

Non-Insignificant Emissions Unit List:

The following non-insignificant emissions units are located at Ford Motor Company Ohio Assembly Plant:

- B004 Phosphate heaters (2) 20.9 mmBtu/hr each
- B008 Prime booth air supply 50.0 mmBtu/hr
- B009 Prime booth air supply 50.0 mmBtu/hr
- B010 Tutone and repair scuff booth air supply 13.20 mmBtu/hr
- B011 Enamel booth #1 air supply 98.0 mmBtu/hr
- B013 Enamel booth #2 air supply 98.0 mmBtu/hr
- B015 Enamel booth #3 air supply 234.0 mmBtu/hr
- B020 Wax and touch-up booth air supply 16.80 mmBtu/hr

B022 Prime dry off oven air supply 12.90 mmBtu/hr  
B023 Body shop air supply 130.30 mmBtu/hr  
B024 Trim shop air supply 24.90 mmBtu/hr  
B025 Predelivery booth air supply 24.60 mmBtu/hr  
B027 Carbon wheels desorption boiler 10.9 mmBtu/hr  
K007 E-coat dip tank and oven (RTO)  
K013 Prime booth and oven (RTO)  
K014 Prime booth and oven (RTO)  
K015 Enamel booth #1 and oven (RTO)  
K016 Enamel booth #2 and oven (RTO)  
K017 Enamel booth #3 and oven (RTO)  
K018 Wax and touch-up booth  
K019 Wax and touch-up booth  
K021 Final repair booth, oven, and spot repair  
K023 Windshield glass installation process  
K024 Sealer operations consisting of sealer deck, 3 application booths, and ovens  
P013 Solvent wipe  
P100 Organic compound emissions resulting from cleaning and purging of equipment associated with emissions units K007 through K020

In addition, there are a number of insignificant emissions units.

#### Establishment of PALs

PALs were established for each pollutant in accordance with OAC rule 3745-31-32 as follows:

- The facility-wide VOC emission limitation of 1149.2 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 1998 and 1999 of 1097.6 and 1114.1 tons, respectively. Average facility-wide VOC emissions for 1998 and 1999 are 1105.9 tons per year. Due to permits issued since 1998 and 1999 allowing an increase in VOC emissions of 4.29 tons per year, the adjusted baseline actual facility-wide VOC emissions are 1110.2 tons per year. Adding the significance level for VOC emissions of 39 tons per year to the baseline actual facility-wide VOC emissions of 1110.2 gives an allowable VOC emission rate of 1149.2 tons per year.
- The facility-wide PM<sub>2.5</sub> emission limitation of 26.32 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>2.5</sub> emissions from 1999 and 2000 of 17.47 and 15.37 tons, respectively. Average facility-wide PM<sub>2.5</sub> emissions for 1999 and 2000 are 16.42 tons per year. Adding the significance level for PM<sub>2.5</sub> emissions of 9.9 tons per year to the baseline actual facility-wide PM<sub>2.5</sub> emissions of 16.42 gives an allowable PM<sub>2.5</sub> emission rate of 26.32 tons per year.
- The facility-wide PM<sub>10</sub> emission limitation of 31.32 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>10</sub> emissions from 1999 and 2000 of 17.47 and 15.37 tons, respectively. Average facility-wide PM<sub>10</sub> emissions for 1999 and 2000 are 16.42 tons per year. Adding the significance level for PM<sub>10</sub> emissions of 14.9 tons per year to the baseline actual facility-wide PM<sub>10</sub> emissions of 16.42 gives an allowable PM<sub>10</sub> emission rate of 31.32 tons per year.

- The facility-wide NO<sub>x</sub> emission limitation of 124.27 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NO<sub>x</sub> emissions from 2004 and 2005 of 75.46 and 95.08 tons, respectively. Average facility-wide NO<sub>x</sub> emissions for 2004 and 2005 are 85.27 tons per year. Adding the significance level for NO<sub>x</sub> emissions of 39 tons per year to the baseline actual facility-wide NO<sub>x</sub> emissions of 85.27 gives an allowable NO<sub>x</sub> emission rate of 124.27 tons per year.
- The facility-wide CO emission limitation of 255.36 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2004 and 2005 of 138.34 and 174.37 tons, respectively. Average facility-wide CO emissions for 2004 and 2005 are 156.36 tons per year. Adding the significance level for CO emissions of 99 tons per year to the baseline actual facility-wide CO emissions of 156.36 gives an allowable CO emission rate of 255.36 tons per year.
- The facility-wide SO<sub>2</sub> emission limitation of 40.33 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SO<sub>2</sub> emissions from 2004 and 2005 of 1.2 and 1.46 tons, respectively. Average facility-wide SO<sub>2</sub> emissions for 2004 and 2005 are 1.33 tons per year. Adding the significance level for SO<sub>2</sub> emissions of 39 tons per year to the baseline actual facility-wide SO<sub>2</sub> emissions of 1.33 gives an allowable SO<sub>2</sub> emission rate of 40.33 tons per year.
- The facility-wide greenhouse gas (GHG) emission limitation of 167,916 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2003 and 2004 of 89,194 and 96,640 tons, respectively. Average facility-wide GHG emissions for 2003 and 2004 are 92,917 tons per year. Adding the significance level for GHG emissions of 74,999 tons per year to the baseline actual facility-wide GHG emissions of 92,917 gives an allowable GHG emission rate of 167,916 tons per year.

#### Conclusion

This project will allow Ford Motor Company's Ohio Assembly Plant greater operational flexibility without significant increases in actual emissions. Under the PAL permit, the facility will be able to make physical changes or changes in the method(s) of operations provided major new source review thresholds are not exceeded and emissions remain under the PAL permit allowable emission rates. This will enable the facility to institute operational changes quickly, thus providing a competitive business advantage in the automotive industry.



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
Ford Motor Company - Ohio Assembly Plant

Issue Date: 7/10/2013  
Permit Number: P0104237  
Permit Type: Administrative Modification  
Permit Description: Facility-wide PAL permit  
Facility ID: 0247030471  
Facility Location: Ford Motor Company - Ohio Assembly Plant  
650 Miller Road,  
Avon Lake, OH 44012-0000  
Facility Description: Automobile Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kristen Switzer, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171





**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Ford Motor Company - Ohio Assembly Plant

Facility ID:	0247030471
Permit Number:	P0104237
Permit Type:	Administrative Modification
Issued:	7/10/2013
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Ford Motor Company - Ohio Assembly Plant

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**Draft Permit-to-Install**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0104237  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0247030471  
Facility Description: Automobile and light truck assembly plant  
Application Number(s): A0036592, A0037427, M0000486, M0000487, M0000488, M0000489, M0001745, A0046074  
Permit Number: P0104237  
Permit Description: Facility-wide PAL permit  
Permit Type: Administrative Modification  
Permit Fee: \$4,700.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 7/10/2013  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Ford Motor Company - Ohio Assembly Plant  
650 Miller Road  
Avon Lake, OH 44012-0000

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0104237  
 Permit Description: Facility-wide PAL permit

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>B004</b>
Company Equipment ID:	Phosphate Heaters
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B008</b>
Company Equipment ID:	Prime booth (CV) air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B009</b>
Company Equipment ID:	Prime Booth (MPV) air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B010</b>
Company Equipment ID:	Tutone and repair scuff booth air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B011</b>
Company Equipment ID:	Enamel Booth #1 air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B013</b>
Company Equipment ID:	Enamel Booth #2 air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B015</b>
Company Equipment ID:	Enamel Booth #3 air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B020</b>
Company Equipment ID:	(MPV) Wax and touch-up booth air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B022</b>
Company Equipment ID:	Prime dry off oven air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B023</b>
Company Equipment ID:	Body shop air supply
Superseded Permit Number:	02-04022
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>B024</b> Trim shop air supply 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>B025</b> Predelivery booth air supply 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>B027</b> Carbon wheels desorption boiler 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K007</b> E-coat system 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K013</b> Prime (Guidecoat) System (MPV) 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K014</b> Prime (Guidecoat) Booth System (CV) 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K015</b> Topcoat (Enamel) system #1 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K016</b> Topcoat (Enamel) system #2 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K017</b> Topcoat (Enamel) system #3 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K018</b> Wax and touchup booth (MPV) 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K019</b> Wax and touchup booth (CV) 02-04022 Not Applicable
<b>Emissions Unit ID:</b> Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	<b>K021</b> Final repair system (MPV) 02-09278 Not Applicable



**Draft Permit-to-Install**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0104237  
**Facility ID:** 0247030471

**Effective Date:** To be entered upon final issuance

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K023**

Windshield glass installation  
P0103750  
Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K024**

Sealer Application Operation  
02-22468  
Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P013**

Manual solvent wipe  
02-04022  
Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P100**

Purge and clean  
02-09278  
Not Applicable



**Draft Permit-to-Install**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0104237  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Draft Permit-to-Install**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0104237  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. Establishment of Plantwide Applicability Limitations (PALs)

- a) The facility-wide VOC emission limitation of 1149.2 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 1998 and 1999 of 1097.6 and 1114.1 tons, respectively. Average facility-wide VOC emissions for 1998 and 1999 are 1105.9 tons per year. Due to permits issued since 1998 and 1999 allowing an increase in VOC emissions of 4.29 tons per year, the adjusted baseline actual facility-wide VOC emissions are 1110.2 tons per year. Adding the significance level for VOC emissions of 39 tons per year to the baseline actual facility-wide VOC emissions of 1110.2 gives an allowable VOC emission rate of 1149.2 tons per year.
- b) The facility-wide PM<sub>2.5</sub> emission limitation of 26.32 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>2.5</sub> emissions from 1999 and 2000 of 17.47 and 15.37 tons, respectively. Average facility-wide PM<sub>2.5</sub> emissions for 1999 and 2000 are 16.42 tons per year. Adding the significance level for PM<sub>2.5</sub> emissions of 9.9 tons per year to the baseline actual facility-wide PM<sub>2.5</sub> emissions of 16.42 gives an allowable PM<sub>2.5</sub> emission rate of 26.32 tons per year.
- c) The facility-wide PM<sub>10</sub> emission limitation of 31.32 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>10</sub> emissions from 1999 and 2000 of 17.47 and 15.37 tons, respectively. Average facility-wide PM<sub>10</sub> emissions for 1999 and 2000 are 16.42 tons per year. Adding the significance level for PM<sub>10</sub> emissions of 14.9 tons per year to the baseline actual facility-wide PM<sub>10</sub> emissions of 16.42 gives an allowable PM<sub>10</sub> emission rate of 31.32 tons per year.
- d) The facility-wide NO<sub>x</sub> emission limitation of 124.27 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NO<sub>x</sub> emissions from 2004 and 2005 of 75.46 and 95.08 tons, respectively. Average facility-wide NO<sub>x</sub> emissions for 2004 and 2005 are 85.27 tons per year. Adding the significance level for NO<sub>x</sub> emissions of 39 tons per year to the baseline actual facility-wide NO<sub>x</sub> emissions of 85.27 gives an allowable NO<sub>x</sub> emission rate of 124.27 tons per year.
- e) The facility-wide CO emission limitation of 255.36 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2004 and 2005 of 138.34 and 174.37 tons, respectively. Average facility-wide CO emissions for 2004 and 2005 are 156.36 tons per year. Adding the significance level for CO emissions of 99 tons per year to the baseline actual facility-wide CO emissions of 156.36 gives an allowable CO emission rate of 255.36 tons per year.
- f) The facility-wide SO<sub>2</sub> emission limitation of 40.33 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SO<sub>2</sub> emissions from 2004 and 2005 of 1.2 and 1.46 tons, respectively. Average facility-wide SO<sub>2</sub> emissions for 2004 and 2005 are 1.33 tons per year. Adding the significance level for SO<sub>2</sub> emissions of 39 tons per year to the baseline actual facility-wide SO<sub>2</sub> emissions of 1.33 gives an allowable SO<sub>2</sub> emission rate of 40.33 tons per year.
- g) The facility-wide greenhouse gas (GHG) emission limitation of 167,916 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2003 and 2004 of 89,194 and 96,640 tons,



respectively. Average facility-wide GHG emissions for 2003 and 2004 are 92,917 tons per year. Adding the significance level for GHG emissions of 74,999 tons per year to the baseline actual facility-wide GHG emissions of 92,917 gives an allowable GHG emission rate of 167,916 tons per year.

2. Plantwide Applicability Limitations (PALs)

a) Emission Limitation:

Facility-wide VOC emissions shall not exceed 1149.2 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing VOC emissions on a rolling, 12-month basis from all emissions units that emit VOCs at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total VOC emissions during each calendar month and consecutive 12-month period for each such source. VOC emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

b) Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM<sub>2.5</sub> emissions on a rolling, 12-month basis from all emissions units that emit PM<sub>2.5</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total PM<sub>2.5</sub> emissions during each calendar month and consecutive 12-month period for each such source. PM<sub>2.5</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

c) Emission Limitation:

Facility-wide PM<sub>10</sub> emissions shall not exceed 31.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM<sub>10</sub> emissions on a rolling, 12-month basis from all emissions units that emit PM<sub>10</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total PM<sub>10</sub> emissions during each calendar month and consecutive 12-month period for each such source. PM<sub>10</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.



d) Emission Limitation:

Facility-wide NO<sub>x</sub> emissions shall not exceed 124.27 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing NO<sub>x</sub> emissions on a rolling, 12-month basis from all emissions units that emit NO<sub>x</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total NO<sub>x</sub> emissions during each calendar month and consecutive 12-month period for each such source. NO<sub>x</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

e) Emission Limitation:

Facility-wide CO emissions shall not exceed 255.36 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all emissions units that emit CO at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total CO emissions during each calendar month and consecutive 12-month period for each such source. CO emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

f) Emission Limitation:

Facility-wide SO<sub>2</sub> emissions shall not exceed 40.33 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SO<sub>2</sub> emissions on a rolling, 12-month basis from all emissions units that emit SO<sub>2</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total SO<sub>2</sub> emissions during each calendar month and consecutive 12-month period for each such source. SO<sub>2</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

g) Emission Limitation:

Facility-wide GHG emissions shall not exceed 167,916 tons per year on a rolling, 12-month basis.



Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all emissions units that emit GHG at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total GHG emissions during each calendar month and consecutive 12-month period for each such source. GHG emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

3. PAL Monitoring and Record Keeping Requirements

- a) The permittee shall maintain a copy of all records necessary to determine compliance with any requirement of OAC rule 3745-31-32(A) and of the PAL, including a determination of each emission unit's rolling, 12-month total emissions, for 5 years from the date of such record.
- b) The permittee shall retain a copy of the following records for the duration of the PAL effective period plus five years:
  - (1) a copy of the PAL permit application and any applications for revisions to the PAL; and
  - (2) each annual certification of compliance pursuant to Title V and the data relied on in certifying compliance.
- c) The permittee shall monitor all emissions units at the facility for VOC, PM<sub>2.5</sub>, PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS and/or emission factors).

4. PAL Reporting Requirements

- a) The permittee shall submit semiannual monitoring reports and prompt deviation reports to the Ohio EPA Northeast District Office in accordance with the applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:
  - (1) Semiannual report:

The semi-annual report shall be submitted to the Ohio EPA Northeast District Office within thirty days of the end of each reporting period. This report shall contain the following information:

    - a. The identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install.
    - b. Total annual emissions (tons per year) based on a rolling, 12-month total for each month in the reporting period recorded pursuant to B.2 of these terms and conditions.



- c. All data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emissions. It is acceptable for this data to be maintained at the facility and made available to the Ohio EPA upon request.
- d. A list of any emissions units modified or added to the major stationary source during the preceding 6-month period.
- e. The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.
- f. A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of any pollutant or the number determined by method included in the PAL permit (OAC rule 3745-31-32(A)(11)(g)).
- g. A signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(2) Deviation report:

The major stationary source owner or operator shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to paragraph (A)(3)(c)(iii) of OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit. The reports shall contain the following information:

- a. the identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install;
- b. the PAL requirement that experienced the deviation or that was exceeded;
- c. emissions resulting from the deviation or the exceedance; and
- d. a signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.



(3) Re-validation results:

The owner or operator shall submit to the Ohio EPA Northeast District Office the results of any re-validation test or method within three months after completion of such test or method.

5. PAL Compliance Demonstration

- a) Emission calculations to demonstrate compliance with the PAL include VOC emissions from startups, shutdowns, and malfunctions.
- b) The permittee shall determine monthly VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM<sub>10</sub> and PM<sub>2.5</sub> emissions in accordance with the Monitoring and Record Keeping Requirements for each emissions unit for the purpose of summing plantwide VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions and determining the rolling, 12-month VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM<sub>10</sub> and PM<sub>2.5</sub> emissions.

6. PAL Permit Requirements

- a) The PALs in section B.1 shall be effective for ten years. The PAL term commences on the date of issuance of this permit.
- b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire until a revised PAL permit is issued if a complete application is received by Ohio EPA Northeast District Office within the time frame specified. (OAC rule 3745-31-32(A)(9)(b))
  - (1) If the permittee fails to meet the application requirements in section B.6.b) or the PAL expires, the facility is subject to the requirements of OAC rule 3745-31-32(A)(8).
  - (2) This permit authorizes projects involving the installation of new emissions units and modification of existing emissions units that do not require an increase in emissions limitations provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.
  - (3) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the Ohio EPA Northeast District Office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.

7. The provisions of OAC rule 3745-114 address Ohio's "Air Toxic Policy" and the mechanism for evaluating certain air toxic contaminants from air emissions sources. The provisions of the regulation do not apply to a pollutant that is subject to a maximum achievable control technology (MACT) standard or residual risk standard under section 112 of the Federal Clean Air Act pursuant to the Ohio Revised Code (ORC) 3704.03(F)(4)(e). The following emissions units at this facility are subject to 40 CFR Part 63, Subpart IIII, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:



B005 (Air supply for E-Coat scuff booth 9.6 mmBtu/hr);  
B006 (Air supply for E-Coat scuff booth 9.6 mmBtu/hr);  
B007 (Air supply for underbody spray booth 9.6 mmBtu/hr);  
B008 (Air supply for prime spray booth 50.0 mmBtu/hr);  
B009 (Air supply for prime spray booth 50.0 mmBtu/hr);  
B010 (Air supply to tutone and repair scuff booth 13.2 mmBtu/hr);  
B011 (Air supply for enamel spray booth no. 1 - 98.0 mmBtu/hr);  
B013 (Air supply for enamel spray booth no. 2 - 98.0 mmBtu/hr);  
B015 (Air supply for enamel spray booth no. 3 - 234.0 mmBtu/hr);  
B019 (Air supply for wax and touchup spray booth 9.6 mmBtu/hr);  
B020 (Air supply for wax and touchup spray booth 16.8 mmBtu/hr);  
B021 (Air supply for tutone/repair dry off oven 7.7 mmBtu/hr);  
B022 (Air supply for dry off oven prime 12.9 mmBtu/hr);  
B025 (Air supply for predelivery spray booth 24.6 mmBtu/hr);  
B026 (Carbon wheel desorption preheat burners 6.0 mmBtu/hr);  
B027 (Carbon wheel desorption boiler 12.5 mmBtu/hr);  
K007 (E-Coat system) including dip tank, oven, and RTO;  
K013 (Prime Guidecoat System) including prime booth, oven, and RTO;  
K014 (Prime Guidecoat System) including prime booth, oven, and RTO;  
K015 (Topcoat/Enamel System #1) including enamel booth, oven, and RTO;  
K016 (Topcoat/Enamel System #2) including enamel booth, oven, and RTO;  
K017 (Topcoat/Enamel System #3) including enamel booth, oven, and RTO;  
K018 (Wax and touchup booth);  
K019 (Wax and touchup booth);  
K021 (Final repair system) including final repair booth, oven, and spot repair;  
K023 (Windshield glass installation process);  
K024 (Sealer operations) including sealer deck, sealer application booth, and ovens;  
P013 (Manual solvent wipe);  
P019 (E-Coat scuff booth);  
P020 (E-Coat scuff booth);  
P021 (Prime and tutone scuff booth); and  
P100 (Purge and clean).

The following emissions units at the facility are subject to 40 CFR Part 63, Subpart EEEE, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

T040 (Windshield Washer Fluid Tank) including the tank and distribution system.

The following emissions units at the facility are subject to 40 CFR Part 63, Subpart ZZZZ, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

B028 (148 HP electrical emergency generator);  
B029 (148 HP electrical emergency generator);  
B030 (148 HP electrical emergency generator);  
B031 (148 HP electrical emergency generator);  
B032 (148 HP electrical emergency generator);  
B033 (148 HP electrical emergency generator);



B034 (148 HP electrical emergency generator);  
B035 (255 HP firefighting water pump);  
B036 (255 HP firefighting water pump);  
B038 (148 HP electrical emergency generator);  
B039 (148 HP electrical emergency generator); and  
B040 (183 HP Clarke firefighting pump).

In addition, if the toxic air contaminant is an organic Hazardous Air Pollutant (HAP) subject to the MACT standard identified above (40 CFR Part 63, Subpart IIII, Subpart EEEE, and Subpart ZZZZ) and emitted by any air contaminant source not identified above, modeling in accordance with Ohio's "Air Toxic Policy" is not required.

In the event any future MACT standards are deemed applicable to the facility and/or any air contaminant source(s) at the facility, those source(s) will not be subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs.

For air contaminant sources not subject to a MACT standard, physical changes to or changes in the method of operation of any of the emissions units at the facility could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change to such air contaminant sources that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change without first obtaining Ohio EPA approval. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously evaluated;
- b) Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c) Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install would not be required.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- d) A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- e) Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and



- f) Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

The results of any modeling shall be submitted with the semi-annual report.

Physical changes to or changes in the method of operation of any emissions units at the facility that satisfy the "Air Toxic Policy" do not require a new permit and/or permit modification.

In lieu of the above requirements, the permittee may devise its own method to demonstrate that the change(s) will satisfy the "Air Toxic Policy" subject to approval by the Ohio EPA. This could include initial modeling under "worst case scenario" and evaluating whether or not each change would fall within that scenario and satisfy the "Air Toxic Policy".

8. Revisions to Best Available Technology (BAT) Limits During a Modification under the PAL

a) Background

Under OAC rule 3745-31-05, all new or modified air contaminant sources, with the exception of sources subject to exemptions and permits-by-rule as defined in OAC rule 3745-31-03, must employ Best Available Technology (BAT) as defined in OAC rule 3745-31-01. BAT requirements have been defined for each air contaminant source contained in this permit.

Under ORC 3704.03(F)(2), no installation permit is required to be obtained for activities that occur under the Plantwide Applicability Limit (PAL) permit if the activities are subject to and in compliance with any applicable PAL and subject to and in compliance with any applicable PAL rules contained in OAC Chapter 3745-31.

Under these provisions, a permit-to-install or permit-to-install and operate is not required to be obtained when an emissions unit covered by the PAL is installed or modified. However, PAL permit emissions units that are installed or modified during the life of the PAL permit must continue to (for an existing source) or begin to (for a new source) employ BAT where applicable.

b) New or Modified Emissions Unit BAT Requirements

Prior to installation or modification of an emissions unit covered under the PAL permit, the owner or operator shall evaluate applicability, and, if applicable, determine BAT. This evaluation and determination shall follow applicable Ohio EPA air quality rules, guidelines, and policies associated with BAT determinations. The determination of BAT shall include the following steps, as appropriate:

- (1) Determination of the size and type of emissions unit that will be considered a "substantially similar source" for the BAT determination purposes.
- (2) Researching emissions limits or work practices for known similar sources. At a minimum, the research should include reviewing the Ohio EPA BAT database, U.S. EPA's BACT/RACT/LAER database, reviewing applicable state regulation limits (excluding severe non-attainment area regulations), and permits from other similar sources. Only "substantially similar sources" that have been demonstrated to operate satisfactorily in Ohio or other states with similar air quality should be included in this research.



- (3) Completing a cost-effectiveness analysis following Ohio EPA, Division of Air Pollution Control Engineering Guide #46 for any pollutant where the uncontrolled potential-to-emit is greater than 70 tons per year. The uncontrolled potential-to-emit should take into account any federally enforceable limitations or physical limitations on the potential-to-emit.
  - (4) A determination of emission rate units to be used for the BAT determination. The units should be consistent with the units utilized in similar Ohio EPA issued emissions unit permits.
  - (5) A determination of the monitoring, record keeping, and reporting requirements for the BAT determination. The monitoring, record keeping, and reporting requirements shall be consistent with the monitoring, record keeping, and reporting requirements already established as part of the PAL permit.
  - (6) A determination of the compliance method to be used for the BAT determination. The compliance method shall be consistent with the compliance method utilized in the PAL permit for similar emissions units or in similar emissions unit permits issued by Ohio EPA.
  - (7) An evaluation of the above information and a determination concerning the selected BAT.
- c) The results of the BAT determination shall include, at a minimum, the following:
- (1) a description of the type of emissions unit evaluated;
  - (2) the numerical BAT value selected;
  - (3) the emission rate unit selected;
  - (4) a description of any associated control equipment selected as BAT;
  - (5) a description of any federally enforceable restrictions requested to be used; and
  - (6) a description of any work practices, raw material specifications, throughput limitations, and source design characteristics to be used.
- The owner or operator may consult with Ohio EPA for assistance in determining an acceptable BAT determination.
- d) Once the new or modified source is installed and operating, the owner or operator shall comply with the BAT determination selected utilizing the compliance determination selected. In addition, the owner or operator shall follow any monitoring, record keeping, and reporting selected to support the BAT determination.
- e) The BAT determination selected by the owner or operator, and its associated monitoring, record keeping, reporting, and compliance determination methods shall be effective until the director issues a revised permit containing a reevaluation and redetermination of BAT.



- f) Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plantwide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.8.b) through B.8.d), and the following paragraph (B.9), shall be considered void and no longer required for changes made in compliance with the requirements of the PAL permit.

9. New or Modified Emissions Unit BAT Reporting

Under OAC paragraph 3745-31-32(A)(13)(a)(iv), the owner or operator of the PAL permit shall submit a list of any emissions units modified or added to the major stationary source during the preceding six-month reporting period. In addition to the information required to be submitted under OAC paragraph 3745-31-32(A)(13)(a) for the required semiannual report, the owner or operator of the PAL permit shall include a report describing the work that was done to determine BAT for a new or modified source. This report shall include, at a minimum, the background information collected for the BAT determination and the information described in B.8.b).

- 10. The terms and conditions contained in this permit shall supercede the terms and conditions in Permit to Install (PTI) 02-04022 issued 09/17/2008 for emissions units B004, B005, B006, B007, B008, B009, B010, B011, B013, B015, B019, B020, B021, B022, B023, B024, B025, B026, B027, K007, K013, K014, K015, K016, K017, K018, K019, and P013; PTI 02-09278 issued 09/17/2008 for emissions units K021 and P100 (formerly Z003); PTI 02-22468 issued 02/27/2007 for emissions unit K024; and PTI P0103750 issued 12/29/2008 for emissions unit K023.

- 11. The permittee shall comply with all applicable sections of 40 CFR Part 63, Subpart IIII, for the following emissions units and their associated combustion sources, respectively: K007; K013 (B008 and B022); K014 (B009); K015 (B011, B026, and B027); K016 (B013, B021, B026, and B027); K017 (B015, B026, and B027); K018 (B020); K019 (B019); K021 (B025); K023; K024 (B007); P013; P019 (B005); P020 (B006); and P021 (B010).

- 12. The permittee shall comply with any applicable sections of 40 CFR Part 63, Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, no later than the compliance date specified upon issuance of the final rule. Any applicable permit terms and conditions associated with 40 CFR Part 63, Subpart DDDDD, shall be incorporated in accordance with OAC rule 3745-31-32(A)(9)(e) either at the time of PAL permit renewal or Title V permit renewal, whichever occurs first.

The following sources will be subject to 40 CFR Part 63, Subpart DDDDD: East admin. boiler #1/Superior rated at 2.024 mmBtu/hr heat input capacity (emissions unit B041), East admin. boiler #2/Superior rated at 2.024 mmBtu/hr heat input capacity (emissions unit B042), Phosphate boiler #1/Cleaver Brooks rated at 20.992 mmBtu/hr heat input capacity (emissions unit B004), Phosphate boiler #2/Cleaver Brooks rated at 20.992 mmBtu/hr heat input capacity (emissions unit B004), West admin. boiler #1/Fitness Center rated at 4.064 mmBtu/hr heat input capacity (emissions unit B043), and West admin. boiler #2/Fitness Center rated at 4.064 mmBtu/hr heat input capacity (emissions unit B044). Combustion sources associated with coating lines and ovens are subject to 40 CFR Part 63, Subpart IIII, and, therefore, are not subject to 40 CFR Part 63, Subpart DDDDD.

- 13. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:



- B005: Air supply for E-coat scuff booth (9.6 mmBtu/hr);
- B006: Air supply for E-coat scuff booth (9.6 mmBtu/hr);
- B007: Air supply for underbody spray booth (9.6 mmBtu/hr);
- B019: Air supply for wax and touchup spray booth (9.6 mmBtu/hr);
- B021: Air supply for tutone/repair dry off oven (7.7 mmBtu/hr);
- B026: Carbon wheel desorption preheat burners (6.0 mmBtu/hr);
- B028: Emergency generator (148 hp);
- B029: Emergency generator (148 hp);
- B030: Emergency generator (148 hp);
- B031: Emergency generator (148 hp);
- B032: Emergency generator (148 hp);
- B033: Emergency generator (148 hp);
- B034: Emergency generator (148 hp);
- B035: Firefighting water pump (255 hp);
- B036: Firefighting water pump (255 hp);
- B038: Emergency generator (148 hp);
- B039: Emergency generator (148 hp);
- B040: Clarke firefighting water pump (183 hp);
- G001: Pool vehicle gasoline fill and 20,000 gallon storage tank;
- G002: Vehicle initial gasoline fill and 20,000 gallon storage tank;
- P012: Paint mix room;
- P015: Body welding;
- P016: Brazing operations;
- P017: Brazing finish (sanding);
- P018: Phosphate coating line;
- P019: E-coat scuff booth;
- P020: E-coat scuff booth;
- P021: Prime and tutone scuff booth;
- P022: D-pillar braze booth;
- T001: 12,000 gallon waste purge solvent/paint tank;
- T002: 12,000 gallon waste paint/purge tank;
- T004: 10,000 gallon oil separator storage tank;
- T006: 10,000 gallon brake fluid storage tank;
- T007: 10,000 gallon automatic transmission fluid storage tank;
- T008: 10,000 gallon power steering fluid storage tank;
- T009: 10,000 gallon manual transmission fluid storage tank;
- T010: 10,000 gallon anti-freeze storage tank;
- T011: 6,000 gallon refrigerant storage tank;
- T012: 90,000 gallon No.1 E-coat dump tank;
- T013: 90,000 gallon No. 2 E-coat dump tank;
- T014: two 6,000 gallon E-coat resin storage tanks;
- T016: 6,000 gallon sulfuric acid storage tank;
- T017: 6,000 gallon sodium hydroxide storage tank;
- T019: 6,000 gallon E-coat pigment storage tank;
- T040: 10,000 gallon methanol underground storage tank;
- Z004: Metal finish line grind booth;
- Z005: Small container (e.g. totes, drums, day tanks, etc.);
- Z013: Solvent cold cleaners; and
- Z024: Natural gas fired space heaters.



14. Emissions units K007, K013, K014, K015, K016, K017, K018, K019, K021, K023, K024, P013 and P100 are subject to the following work practices specified in OAC rule 3745-21-29(E) for coating-related activities and cleaning materials for coating operations for which emission limitations are specified under OAC rule 3745-21-29(C):
- a) Store all VOC-containing coatings, thinners, and coating-related waste materials in closed containers;
  - b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, and coating-related waste materials are kept closed at all times except when depositing or removing these materials;
  - c) Minimize spills of VOC-containing coatings, thinners, and coating-related waste materials;
  - d) Convey VOC-containing coatings, thinners, and coating-related waste materials from one location to another in closed containers or pipes;
  - e) Minimize VOC emission from cleaning of storage, mixing and conveying equipment; and
  - f) Develop and implement a work practice plan to minimize VOC emissions from cleaning and from purging of equipment associated with all coating operations for which requirements are specified in OAC rule 3745-21-29 paragraphs (C) and (D). The work practice plan shall specify practices and procedures to ensure that VOC emissions from the following operations are minimized:
    - (1) Vehicle body wiping;
    - (2) Coating line purging;
    - (3) Flushing of coating systems;
    - (4) Cleaning of spray booth grates;
    - (5) Cleaning of spray booth walls;
    - (6) Cleaning of spray booth equipment;
    - (7) Cleaning external spray booth areas; and
    - (8) Other housekeeping measures (e.g., keeping solvent-laden rags in closed containers).

Comment: If a facility subject to this rule already has a work practice plan in place under the national emission standards for hazardous air pollutants (NESHAP), the facility can add to its NESHAP work practice plan the practices and procedures for minimizing non-HAP VOC emissions.



15. The existing emergency or limited use compression ignition (CI) reciprocating internal combustion engines (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The existing stationary CI RICE, emissions units B028, B029, B030, B031, B032, B033, B034, B035, B036, B038 and B039, installed before 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than 5/3/13.
16. The new emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power, and located at a major source for hazardous air pollutants (HAPs), is/are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The new stationary CI RICE, emissions unit B040, installed on or after 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII.
17. Pursuant to 40 CFR Part 64, the permittee has submitted and Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions units K007, K013, K014, K015, K016 and K017 located at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.



**Draft Permit-to-Install**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0104237  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. B004, Phosphate Heaters**

**Operations, Property and/or Equipment Description:**

Phosphate heater (20.9 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart DDDDD	See B.12.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**2. B008, Prime booth air supply**

**Operations, Property and/or Equipment Description:**

Air supply for prime spray booth (50.0 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K013 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K013 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**3. B009, Prime Booth air supply**

**Operations, Property and/or Equipment Description:**

Air supply for prime spray booth (50.0 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K014 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K014 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**4. B010, Tutone and repair scuff booth air supply**

**Operations, Property and/or Equipment Description:**

Air supply for tutone and repair scuff booth (13.2 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart DDDDD	Exempt.  See b)(2)a.



(2) Additional Terms and Conditions

- a. This emissions unit is not subject to the requirements of 40 CFR Part 63, Subpart DDDDD because it is direct-fired.

c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (X_i / \text{Sum of } X_i) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

$X_i$  = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of  $X_i$  = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**5. B011, Enamel Booth #1 air supply**

**Operations, Property and/or Equipment Description:**

Air supply for enamel spray booth No. 1 (98.0 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K015 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K015 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**6. B013, Enamel Booth #2 air supply**

**Operations, Property and/or Equipment Description:**

Air supply for enamel spray booth No. 2 (98.0 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K016 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K016 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**7. B015, Enamel Booth #3 air supply**

**Operations, Property and/or Equipment Description:**

Air supply for enamel spray booth No. 3 (234.0 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions from this facility as specified in B.2.
f.	OAC rule 3745-31-05(D)(1)(a)	NO <sub>x</sub> emissions shall not exceed 24.9 tons per year. See c)(2).
g.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K017 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K017 in this permit.

c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.
- (2) Natural gas usage in this emissions unit shall not exceed 498 mmscf per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain annual records of the volume of natural gas burned, in mmscf, in this emissions unit.
- (3) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (2) The permittee shall submit annual reports that specify the total natural gas usage, in mmscf, for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 24.9 tons per year.

Applicable Compliance Method:

Compliance with the annual NO<sub>x</sub> emission limitation shall be assumed provided that the annual natural gas usage limitation in c)(2) is met.

c. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**8. B020, Wax and touch-up booth air supply**

**Operations, Property and/or Equipment Description:**

Air supply for wax and touchup spray booth (16.8 MMBtu/hr)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K018 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K018 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr, of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**9. B022, Prime dry off oven air supply**

**Operations, Property and/or Equipment Description:**

Air supply for dry off oven prime (12.9 MMBtu/hr)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K013 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K013 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**10. B023, Body shop air supply**

**Operations, Property and/or Equipment Description:**

Body shop air supply (130.3 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.

- (2) Additional Terms and Conditions

- a. None.



c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi/\text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**11. B024, Trim shop air supply**

**Operations, Property and/or Equipment Description:**

Trim shop air supply (24.9 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.

- (2) Additional Terms and Conditions

- a. None.



c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi/\text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**12. B025, Predelivery booth air supply**

**Operations, Property and/or Equipment Description:**

Air supply for predelivery spray booth (24.6 MMBtu/hr)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K021 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K021 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**13. B027, Carbon wheels desorption boiler**

**Operations, Property and/or Equipment Description:**

Boiler-carbon wheels (12.5MMBtu/hr)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions units K015, K016 and K017 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions units K015, K016 and K017 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain annual records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating annual air pollution emissions.

The following formula shall be used to calculate the annual prorated volume of each type of fuel burned in this emissions unit:

$$APV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

APV = the annual prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the annual, total plantwide volume of the fuel used, either natural gas or LPG.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall



be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.



**14. K007, E-coat system**

**Operations, Property and/or Equipment Description:**

E-coat tank and oven

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM (60.390 through 60.398)  In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant prime coat operation subject to the emission limitations/control measures specified in this section.	See b)(2)a.
b.	OAC rule 3745-21-29(C)(1)(a)	See b)(2)b.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)c.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM, 40 CFR Part 63, Subpart IIII, OAC rule 3745-21-29(C)(1)(a)(i), and OAC rule 3745-31-32(A)(6).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) and d)(3) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
e.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)d.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
g.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(6), e)(1) and e)(7).

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:
  - i. 0.17 kilogram of VOC per liter of applied coating solids when solids turnover ratio ( $R_T$ ) is 0.16 or greater.
  - ii.  $0.17 \times 350^{(0.160 - R_T)}$  kg of VOC per liter of applied coating solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.



iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in 40 CFR 60.393(E).

b. The permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio ( $R_T$ ) is 0.16 or greater.

ii.  $0.70 \times 350^{(0.160 - R_T)}$  pounds of VOC per gallon of solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.

iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

c. The permittee shall employ a permanent total enclosure VOC capture system that captures VOC emissions from the E-Coat system. The total capture efficiency shall be 100 percent, by weight, at all times the emissions unit is in operation.

The E-Coat system by design and operation provides a permanent total enclosure. This emissions unit's VOC capture efficiency shall, therefore, be presumed to be 100 percent, by weight. This determination was made by Ohio EPA at the permittee's request, based on the submission of data which verify that the entrance and exit of the E-Coat system are not natural draft openings as defined in U.S. EPA Methods 204 through 204F, 40 CFR Part 51, Appendix M.

d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not



components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (2) The permittee shall collect and record the following information for each day for this emissions unit:
    - a. The name and identification number of each material (coating, solvent, etc.) added to the E-Coat tank;
    - b. The VOC content, in pounds VOC per gallon and in pounds VOC per gallon of solids, of each material added to the E-Coat tank;
    - c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material added to the E-Coat tank;
    - d. The monthly, uncontrolled, volume-weighted average VOC content of all the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-09;
    - e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds VOC per gallon of solids. The daily, controlled VOC emission rate shall be calculated using (i) the daily, uncontrolled, volume-weighted average VOC content and (ii) the overall control efficiency for the



control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

- f. The total uncontrolled VOC emissions from all the materials added to the E-Coat tank, in pounds; and
  - g. The total, controlled VOC emissions from all the materials added to the E-Coat tank, in pounds. The controlled VOC emission rate shall be calculated using (i) the total VOC emissions from d)(2)f above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance.
- (3) The permittee shall collect and record the following information for each month for this emissions unit:
- a. The name and identification number of each coating material added to the E-Coat tank;
  - b. The VOC content, in pound of VOC per gallon of solids, of each material added to the E-Coat tank;
  - c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material employed;
  - d. The monthly, uncontrolled, volume-weighted average VOC content of the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-10; and

The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds of VOC per gallon of solids. The monthly, controlled VOC emission rate shall be calculated using (i) the monthly volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:
  - a. 64.3 Monitoring design criteria:
    - i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.



- ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
  - b. 64.9 Record keeping requirements:
    - i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.
- e) Reporting Requirements
  - (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above.
  - (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)b of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
  - (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)a of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
  - (4) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
  - (5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.
  - (6) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
  - (7) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The VOC destruction efficiency testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that



the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

- i. 0.17 kilogram of VOC per liter of applied coating solids when solids turnover ratio ( $R_T$ ) is 0.16 or greater.
- ii.  $0.17 \times 350^{(0.160 - R_T)}$  kg of VOC per liter of applied coating solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.
- iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in 40 CFR 60.393(E).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in 40 CFR 60.393.

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

c. Emission Limitation:

The permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

- i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio ( $R_T$ ) is 0.16 or greater.



- ii.  $0.70 \times 350^{(0.160 - R_T)}$  pounds of VOC per gallon of solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.
- iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in OAC rule 3745-21-29(F).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

d. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.



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g) Miscellaneous Requirements

(1) None.



**15. K013, Prime (Guidecoat) System**

**Operations, Property and/or Equipment Description:**

Prime booth and oven includes spray prime, hood anti-chip and blackout coatings; 3-Wet process line when combined with K015, K016, or K017

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	Volatile organic compound (VOC) emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.
b.	OAC rule 3745-21-29(C)(1)(c) and (e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C), OAC rule 3745-31-32(A)(6), OAC rules 3745-21-29(C)(1)(c)



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, b)(2)c, c)(2), c)(3), d)(9) through d)(13) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) Emissions unit K013 includes Prime booth No. 1 and oven (includes spray prime, hood anti-chip, and blackout coatings). Alternatively, emissions unit K013 may be adjoined to the front of the Topcoat booth 1, 2, or 3 (emissions unit K015, K016, or K017) to apply Guidecoat coatings in a "3-Wet" sequence.



- (2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.
  - (3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
  - (4) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.
  - (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

    - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
    - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
  - (3) The permittee shall maintain records for emissions unit K013 that will enable, for each calendar day, the calculation of the daily VOC emission rate in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculation on a daily basis and shall maintain records of the results of the calculations.



- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:
  - a. 64.3 Monitoring design criteria:
    - i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
    - ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
  - b. 64.9 Record keeping requirements:
    - i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.
- (7) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K013 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.
- (8) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.
- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (10) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (12) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (13) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.
- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (4) The permittee shall also submit annual reports that specify the total VOC emissions from emissions unit K013 for the previous calendar year. These reports shall be submitted by January 31 of each year.



- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
  - (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
  - (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).



Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec. 1988) and any subsequent revisions thereof.

The VOC destruction and capture efficiency testing shall be conducted prior to Title V permit expiration.



The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

c. Emission Limitation:

VOC emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.



d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

e. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.



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- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).
  
- g) Miscellaneous Requirements
  - (1) None.



**16. K014, Prime (Guidecoat) Booth System**

**Operations, Property and/or Equipment Description:**

Prime booth and oven includes spray prime, hood anti-chip and blackout coatings; 3-Wet process line when combined with K015, K016, or K017

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	Volatile organic compound (VOC) emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.
b.	OAC rule 3745-21-29(C)(1)(c) and (e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C), OAC rule 3745-31-32(A)(6), OAC rules 3745-21-29(C)(1)(c)



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, b)(2)c, c)(2), c)(3), d)(9) through d)(13) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) Emissions unit K014 includes Prime booth No. 1 and oven (includes spray prime, hood anti-chip, and blackout coatings). Alternatively, emissions unit K014 may be adjoined to the front of the Topcoat booth 1, 2, or 3 (emissions unit K015, K016, or K017) to apply Guidecoat coatings in a "3-Wet" sequence.



- (2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.
  - (3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
  - (4) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.
  - (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (3) The permittee shall maintain records for emissions unit K013 that will enable, for each calendar day, the calculation of the daily VOC emission rate in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculation on a daily basis and shall maintain records of the results of the calculations.



- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:
  - a. 64.3 Monitoring design criteria:
    - i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
    - ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
  - b. 64.9 Record keeping requirements:
    - i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.
- (7) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K013 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.
- (8) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.
- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (10) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control



while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

- (12) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (13) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.
- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (4) The permittee shall also submit annual reports that specify the total VOC emissions from emissions unit K013 for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).



- (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
  - (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid



characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec. 1988) and any subsequent revisions thereof.

The VOC destruction and capture efficiency testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.



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The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

c. Emission Limitation:

VOC emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.



d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

e. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.



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- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).
  
- g) Miscellaneous Requirements
  - (1) None.



**17. K015, Topcoat (Enamel) system #1**

**Operations, Property and/or Equipment Description:**

Enamel booth No. 1 and 3-Wet process line when combined with K013 or K014

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	Volatile organic compound (VOC) emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.
b.	OAC rule 3745-21-29(C)(1)(d) and (e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C), OAC rule 3745-31-



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		32(A)(6), OAC rules 3745-21-29(C)(1)(d) and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, b)(2)c, c)(2), c)(3), d)(10) through d)(14) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) Emissions unit K015 includes Enamel booth No. 1 and oven to apply Topcoat (includes basecoat and clearcoat application). Alternatively, emissions unit K013 or K014 may be adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.



- (2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.
  - (3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
  - (4) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.
  - (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizers when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (3) The permittee shall maintain records for emissions unit K015 that will enable, for each calendar day, the calculation of the daily VOC emission rate in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculation on a daily basis and shall maintain records of the results of the calculations.



- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:
  - a. 64.3 Monitoring design criteria:
    - i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
    - ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
  - b. 64.9 Record keeping requirements:
    - i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.
- (7) The permittee shall maintain monthly records for emissions unit K015 of the volume-weighted average mass of the VOC per volume of applied coating solids and the calculations required by 40 CFR Part 60, Subpart MM, section 60.393.
- (8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K015 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.
- (9) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.
- (10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (11) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (12) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (13) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (14) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.
  - (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
  - (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
  - (4) The permittee shall also submit annual reports that specify the total VOC emissions from emissions unit K015 for the previous calendar year. These reports shall be submitted by January 31 of each year.



- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
  - (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
  - (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).



Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec. 1988) and any subsequent revisions thereof.

The VOC destruction and capture efficiency testing shall be conducted prior to Title V permit expiration.



The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

c. Emission Limitation:

VOC emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.



d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

e. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.



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- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).
  
- g) Miscellaneous Requirements
  - (1) None.



**18. K016, Topcoat (Enamel) system #2**

**Operations, Property and/or Equipment Description:**

Enamel booth No. 2 and 3-Wet process line when combined with K013 or K014

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	Volatile organic compound (VOC) emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.
b.	OAC rule 3745-21-29(C)(1)(d) and (e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C), OAC rule 3745-31-



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		32(A)(6), OAC rules 3745-21-29(C)(1)(d) and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, b)(2)c, c)(2), c)(3), d)(10) through d)(14) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) Emissions unit K016 includes Enamel booth No. 2 and oven to apply Topcoat (includes basecoat and clearcoat application). Alternatively, emissions unit K013 or K014 may be adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.



- (2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.
  - (3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
  - (4) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.
  - (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizers when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

    - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
    - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
  - (3) The permittee shall maintain records for emissions unit K016 that will enable, for each calendar day, the calculation of the daily VOC emission rate in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculation on a daily basis and shall maintain records of the results of the calculations.



- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:
  - a. 64.3 Monitoring design criteria:
    - i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
    - ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
  - b. 64.9 Record keeping requirements:
    - i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.
- (7) The permittee shall maintain monthly records for emissions unit K016 of the volume weighted average mass of the VOC per volume of applied coating solids and the calculations required by 40 CFR Part 60, Subpart MM, section 60.393.
- (8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K016 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.
- (9) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.
- (10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (11) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (12) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (13) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (14) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.
- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (4) The permittee shall also submit annual reports that specify the total VOC emissions from emissions unit K016 for the previous calendar year. These reports shall be submitted by January 31 of each year.



- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
  - (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
  - (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).



Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec. 1988) and any subsequent revisions thereof.

The VOC destruction and capture efficiency testing shall be conducted prior to Title V permit expiration.



The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

c. Emission Limitation:

VOC emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.



d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

e. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.



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- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).
  
- g) Miscellaneous Requirements
  - (1) None.



**19. K017, Topcoat (Enamel) system #3**

**Operations, Property and/or Equipment Description:**

Enamel booth No. 3 and 3-Wet process line when combined with K013 or K014

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	Volatile organic compound (VOC) emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.
b.	OAC rule 3745-21-29(C)(1)(d) and (e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C), OAC rule 3745-31-



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		32(A)(6), OAC rules 3745-21-29(C)(1)(d) and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, b)(2)c, c)(2), c)(3), d)(10) through d)(14) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) Emissions unit K017 includes Enamel booth No. 3 and oven to apply Topcoat (includes basecoat and clearcoat application). VOC emissions from the oven are controlled by a separate RTO. Alternatively, emissions unit K013 or K014 may be adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.



- (2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.
  - (3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
  - (4) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.
  - (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizers when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
  - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (3) The permittee shall maintain records for emissions unit K017 that will enable, for each calendar day, the calculation of the daily VOC emission rate in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculation on a daily basis and shall maintain records of the results of the calculations.



- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:
  - a. 64.3 Monitoring design criteria:
    - i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
    - ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
  - b. 64.9 Record keeping requirements:
    - i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.
- (7) The permittee shall maintain monthly records for emissions unit K017 of the volume weighted average mass of the VOC per volume of applied coating solids and the calculations required by 40 CFR Part 60, Subpart MM, section 60.393.
- (8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K017 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.
- (9) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.
- (10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (11) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (12) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (13) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (14) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.
- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (4) The permittee shall also submit annual reports that specify the total VOC emissions from emissions unit K017 for the previous calendar year. These reports shall be submitted by January 31 of each year.



- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
  - (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
  - (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201 and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted prior to Title V permit expiration.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).



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Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec. 1988) and any subsequent revisions thereof.

The VOC destruction and capture efficiency testing shall be conducted prior to Title V permit expiration.



The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

c. Emission Limitation:

VOC emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.



d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

e. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.



**Draft Permit-to-Install**

Ford Motor Company - Ohio Assembly Plant

**Permit Number:** P0104237

**Facility ID:** 0247030471

**Effective Date:** To be entered upon final issuance

- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).
  
- g) Miscellaneous Requirements
  - (1) None.



**20. K018, Wax, blackout, and touchup booth**

**Operations, Property and/or Equipment Description:**

Wax, blackout, and touch-up booth

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(d)	Volatile organic compound (VOC) emissions shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted basis (for all coatings employed, excluding cavity wax).
b.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-31-32(A)(6), OAC rule 3745-21-29(C)(2)(c), OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart III.
c.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)a, c)(1), c)(2), d)(4) through d)(8) and e)(4).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(2) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-29(C)(2)(c)	VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)c.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- b. OC emissions resulting from cleanup solvent usage is accounted for under emissions unit P100.
- c. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or



If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (3) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the name, identification number, and type of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating employed;
  - c. for each type of coating specified in b)(2)a, the daily volume-weighted average VOC content of all the coatings employed, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ;
  - d. the number of gallons of all repair lacquers employed;
  - e. the total VOC emission rate for all coatings employed, in pounds; and
  - f. the number of hours of operation.



- (2) The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - c. the daily volume-weighted average VOC content of all the coatings employed, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .
- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.



- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content of all the coatings employed, excluding cavity wax, exceeded 3.5 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (2) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content from cavity wax exceeded 5.4 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (4) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

VOC emissions shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted basis (for all coatings employed, excluding cavity wax).



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

b. Emission Limitation:

VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

c. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

g) Miscellaneous Requirements

- (1) None.



**21. K019, Wax, blackout, and touchup booth**

**Operations, Property and/or Equipment Description:**

Wax, blackout, and touch-up booth

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(d)	Volatile organic compound (VOC) emissions shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted basis (for all coatings employed, excluding cavity wax).
b.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-31-32(A)(6), OAC rule 3745-21-29(C)(2)(c), OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart III.
c.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)a, c)(1), c)(2), d)(4) through d)(8) and e)(4).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(2) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-29(C)(2)(c)	VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
f.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)c.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- b. OC emissions resulting from cleanup solvent usage is accounted for under emissions unit P100.
- c. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or



If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (3) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the name, identification number, and type of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating employed;
  - c. for each type of coating specified in b)(2)a, the daily volume-weighted average VOC content of all the coatings employed, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ;
  - d. the number of gallons of all repair lacquers employed;
  - e. the total VOC emission rate for all coatings employed, in pounds; and
  - f. the number of hours of operation.



- (2) The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - c. the daily volume-weighted average VOC content of all the coatings employed, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .
- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as,



a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content of all the coatings employed, excluding cavity wax, exceeded 3.5 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (2) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content from cavity wax exceeded 5.4 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (4) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted basis (for all coatings employed, excluding cavity wax).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).



b. Emission Limitation:

VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

c. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

g) Miscellaneous Requirements

(1) None.



**22. K021, Final repair system**

**Operations, Property and/or Equipment Description:**

Final repair booth and oven

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-29(C)(1)(f)	VOC emissions shall not exceed 4.8 lbs per gallon of coating, excluding water and exempt solvents.  See B.14 in the facility-wide terms and conditions.
b.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-29(C)(1)(f), OAC rule 3745-31-32(A)(6), OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart III.
c.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(1), c)(2), d)(2) through d)(6) and e)(3).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	<p>40 CFR Part 63, Subpart IIII</p> <p>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.</p>	See b)(2)d.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. The permittee shall comply with this limitation by demonstrating that each coating employed has a VOC content of 4.8 lbs VOC per gallon of coating, as applied, excluding water and exempt solvents.
- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- c. OC emissions resulting from cleanup solvent usage is accounted for under emissions unit P100.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health



Administration (OSHA)-defined carcinogen as specified in 29 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (3) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. For each coating in use at the facility:
    - i. the name and VOC content as received and as applied; and
    - ii. the type of coating, as identified under OAC rule 3745-21-29(C).
  - b. All data, calculations, and test results (including U.S. EPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
  - c. The amount (gallons) of each coating used each month at the facility.
  - d. Records pertaining to a coating line subject to OAC rule 3745-21-29(C)(1)(f) in which the owner or operator elects to demonstrate the ongoing status of compliance with the applicable emission limitation by means of a daily volume-weighted average VOC content:



- i. date of operation;
  - ii. the name and identification number of each coating, as applied on the date of operation;
  - iii. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied on the date of operation; and
  - iv. the daily volume-weighted average VOC content of all coatings, as applied on the date of operation, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for  $C_{VOC,2}$ .
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
  - (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
  - (4) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
  - (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
    - a. the date of the inspection;
    - b. a description of each/any problem identified and the date it was corrected;
    - c. a description of any maintenance and repairs performed; and
    - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.



- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (7) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any monthly record showing that the VOC content of any of the coatings employed exceeded 4.8 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (4) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 4.8 lbs per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.



b. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

g) Miscellaneous Requirements

- (1) None.



**23. K023, Windshield glass installation**

**Operations, Property and/or Equipment Description:**

Windshield Glass Installation Process

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-29(C)(2)(a) and (b), OAC rule 3745-31-32(A)(6) and 40 CFR Part 60, Subpart IIII.
b.	OAC rule 3745-21-29(C)(2)(a)	VOC emissions from glass bonding primer shall not exceed 7.5 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-21-29(C)(2)(b)	VOC emissions from adhesive shall not exceed 2.1 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart IIII  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)c.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. The emission limitations listed above include emissions from vehicle flange and glass cleaners, primers, and adhesives.
- b. The glass bonding primer designation in this permit refers to the new material the permittee has proposed to apply to the windshield which serves the combined function of cleaner and primer.
- c. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the



affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

- (1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month:
  - a. the name and identification number of each coating (glass bonding primer and adhesive) and cleanup solvent, as applied;
  - b. the VOC content of each coating and cleanup solvent, excluding water and exempt solvents, in pounds per gallon, as applied;
  - c. the VOC content of each coating and cleanup solvent, in pounds per gallon, as applied;
  - d. the number of gallons of each coating and cleanup solvent employed, excluding water and exempt solvents; and
  - e. the total VOC emission rate for all coatings and cleanup solvents, in pound [the summation of (c x d) for each coating and cleanup solvent].
- (2) The permittee shall maintain an annual record of the total number of vehicles processed in this emissions unit for the calendar year.
- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of noncomplying coatings (greater than 7.5 pounds VOC per gallon for glass bonding primer and greater than 2.1 pounds VOC per gallon for adhesives). The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (3) The permittee shall submit annual reports to the Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Air Toxic Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no



changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

- (4) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC emissions shall not exceed 7.5 pounds per gallon of coating (glass bonding primer), excluding water and exempt compounds, used for the installation of any glass windows during the assembly of automobiles.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

- b. Emission Limitation:

VOC emissions shall not exceed 2.1 pounds per gallon of coating (adhesive), excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

- c. Emission Limitation:

The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the



affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

g) Miscellaneous Requirements

- (1) None.



**24. K024, Sealer Application Operation**

**Operations, Property and/or Equipment Description:**

Sealer operations including a sealer deck, sealer application booth, and two ovens

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c), OAC rule 3745-31-32(A)(6), OAC rules 3745-21-29(C)(2)(d), (e) and (g), OAC rule 3745-21-09(U)(3) and 40 CFR Part 63, Subpart IIII.
b.	OAC rule 3745-21-09(U)(1)(c)	Volatile organic compound (VOC) emissions from antichip materials shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents.
c.	OAC rule 3745-21-09(U)(3)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-21-09(U)(1)(c).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(2) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
e.	OAC rule 3745-21-29(C)(2)(d)	VOC emissions from sealer shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		conditions.
f.	OAC rule 3745-21-29(C)(2)(e)	VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
g.	OAC rule 3745-21-29(C)(2)(g)	VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	In accordance with 40 CFR 63.3091(c) the average organic hazardous air pollutant (HAP) emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The VOC content limitation specified in b)(1)b does not include OC emissions from cleanup materials. Applicable requirements for cleanup materials are accounted for in emissions unit P100.

c) Operational Restrictions

(1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the volume of each coating, as applied, in gallons;
  - c. the VOC content of each coating, as applied, in pounds per gallon;
  - d. the total VOC emissions from all coatings employed [summation of (b x c) for all coatings]; and
  - e. the VOC content of each coating, excluding water and exempt solvents, in pounds per gallon.
- (2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for this emissions unit:
  - a. the total VOC emissions from all coatings employed [summation of d)(1)d for each month], in pounds or tons.
- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of non-complying coatings (VOC content greater than 3.5 pounds VOC per gallon, excluding water and exempt solvents). The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.
- (2) The permittee shall submit annual reports that specify the actual annual VOC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and cover the previous calendar year.
- (3) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
Volatile organic compound (VOC) emissions from antichip materials shall not exceed 3.5pounds per gallon of coating, excluding water and exempt solvents.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

VOC emissions from sealer shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

d. Emission Limitation:

VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

e. Emission Limitation:

In accordance with 40 CFR 63.3091(c) the average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3151.



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- (2) The "Test Procedure for Determining Bake Oven Exhaust Control Device VOC Loading for Specific Coatings", section 21 of AAMA/USEPA document, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate for Automobile and Light Duty Truck Topcoat Operation" shall be used to determine the VOC contents and VOC distribution of all coatings employed in this emissions unit.

g) **Miscellaneous Requirements**

- (1) This emissions unit, K024, combines sealer operations at the facility into one process with a common vent from the ovens. Sealer operations were previously identified as emissions units K008, K009, K010, K011, K012, P010 and P011.



**25. P013, Manual solvent wipe**

**Operations, Property and/or Equipment Description:**

Solvent wipe

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-29(E), OAC rule 3745-31-32(A)(6) and 40 CFR Part 63, Subpart IIII.
b.	OAC rule 3745-21-29(E)	See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
d.	40 CFR Part 63, Subpart IIII	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.



- (2) Additional Terms and Conditions
  - a. The permittee shall comply with the work practice standards in 40 CFR Part 63, Subpart IIII, section 63.3094.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information for each month:
    - a. the name and identification number of each solvent wipe material, as applied;
    - b. the volume, in gallons, of each solvent wipe material, as applied;
    - c. the VOC content of each solvent wipe material, as applied, in pounds per gallon; and
    - d. the total VOC emissions from all solvent wipe materials employed [summation of (b x c) for all solvent wipe materials], in pounds.
- e) Reporting Requirements
  - (1) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall include the calculation of the annual emissions and shall be submitted by January 31 of each year.
- f) Testing Requirements
  - (1) U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.
- g) Miscellaneous Requirements
  - (1) None.



**26. P100, Purge and clean**

**Operations, Property and/or Equipment Description:**

Organic compound emissions resulting from cleaning and purging of the equipment associated with emissions units K007 through K020

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-29(E), OAC rule 3745-31-32(A)(6) and 40 CFR Part 63, Subpart IIII.
b.	OAC rule 3745-21-29(E)	See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
d.	40 CFR Part 63, Subpart IIII	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.



- (2) Additional Terms and Conditions
  - a. The permittee shall comply with the work practice standards in 40 CFR Part 63, Subpart IIII, section 63.3094.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information for each month:
    - a. the name and identification number of each purge and cleanup material, as applied;
    - b. the volume, in gallons, of each purge and cleanup material, as applied;
    - c. the VOC content of each purge and cleanup material, as applied, in pounds per gallon; and
    - d. the total VOC emissions from all purge and cleanup materials employed [summation of (b x c) for all purge and cleanup materials], in pounds.
- e) Reporting Requirements
  - (1) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall include the calculation of the annual emissions and shall be submitted by January 31 of each year.
- f) Testing Requirements
  - (1) US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.
- g) Miscellaneous Requirements
  - (1) None.