



State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
MONTGOMERY COUNTY

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04167

DATE: 5/24/00

DaimlerChrysler-Dayton Thermal Products
Joe Whitlock
1600 Webster St
Dayton, OH 45404-0000

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 5/24/00

FINAL PERMIT TO INSTALL 08-04167

Application Number: 08-04167
APS Premise Number: 0857040734
Permit Fee: **\$200**
Name of Facility: DaimlerChrysler-Dayton Thermal Products
Person to Contact: Joe Whitlock
Address: 1600 Webster St
Dayton, OH 454040000

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1600 Webster St
Dayton, Ohio**

Description of proposed emissions unit(s):

cab brazing deoiling oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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 prove to be inadequate or cannot meet applicable standards.

10. 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.

11. 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).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

DaimlerChrysler-Dayton Thermal Products**Facility ID: 0857040734****PTI Application: 08-04167****Issued: 5/24/00**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	5.69

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P099 - CAB Brazing Deoiling Oven, 0.8 mmBtu/hr natural gas fired, located in Bldg. 40B, Bay J-3	OAC rule 3745-31-05(A)(3)	1.3 lbs/hr, 31.2 lbs/day, and 5.69 TPY organic compounds
		See A.2.a for emission control requirements
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3)
	OAC rule 3745-21-07(G)(6)	The percent emission reduction specified by this rule is less stringent than the percent emission reduction established pursuant to OAC rule 3745-31-05(A)(3)

2. Additional Terms and Conditions

- 2.a The volatile organic compound emissions from this emissions unit shall be vented to a thermal oxidizer with a minimum destruction efficiency of 95%.
- 2.b The 1.3 lbs/hr and 31.2 lbs/day volatile organic compound emission limitations were established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure

compliance with this limit.

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall be maintained at a minimum of 1400 degrees Fahrenheit until such time as the actual combustion temperature is determined by way of initial performance testing. Following the initial performance test that demonstrates compliance, the average temperature within the thermal incinerator, for any 3-hour block of time when the emission unit is in operation, shall not be less than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated compliance.
2. The furnace shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

Compliance with the pressure differential requirement shall be demonstrated through a fan speed of 1515 revolutions per minute (rpm), whenever this emission unit is in operation, until such time as the actual fan speed is determined by way of initial performance testing.

C. 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 incinerator 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 incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in operation.
 - 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 install, maintain and operate a monitoring device which measures the fan

Emissions Unit ID: **P099**

speed of the furnace fan when the emissions unit is in operation. Units shall be in revolutions per minute (rpm). The monitoring device shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The fan speed of the furnace fan in revolutions per minute (rpm).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure as determined by the furnace fan speed and specified above.

E. Testing Requirements

Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation -
1.3 pounds VOC per hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum pounds per hour throughput of oil by the minimum operating control efficiency of the thermal incinerator, 95% or (1-0.95).

Compliance shall also be determined by emission testing as specified in Section E.4.

2. Emission Limitation -
31.2 pounds VOC per day

Applicable Compliance Method -

Compliance shall be determined by multiplying the 1.3 lbs VOC/hr emission limitation by the maximum operating schedule of 24 hours per day. Therefore, provided compliance is shown for the hourly limitation, compliance will also be shown for the daily limitation.

3. Emission Limitation -
5.69 tons VOC per year

Applicable Compliance Method -

Compliance shall be determined by multiplying the 1.3 lbs VOC/hr emission limitation by the maximum operating schedule of 8,760 hours per year, and convert pounds to tons by dividing the result by 2000 lbs per ton. Therefore, provided compliance is shown for the hourly limitation, compliance will also be shown for the annual limitation.

4. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 90 days of start-up for this emissions unit. The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install and of other applicable Ohio EPA rules.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate and operating control efficiency.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25 or Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The control efficiency (i.e., the percent reduction in mass emissions between 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. The test methods and procedures selected shall be based upon a consideration of the diversity of organic species present and their total concentration, and the consideration of the potential presence of interfering gases.
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
5. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

1. The permittee shall install, operate and maintain an alarm system that will immediately notify the operator when the furnace fan speed is not at least 1515 revolutions per minute, or a minimum speed determined through a compliance demonstration, when this emissions unit is in operation. The alarm system shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall record all instances when the operator is notified by the alarm system of a furnace fan speed deviation as identified in this permit. In addition, the permittee shall submit quarterly reports of the alarm system records. These quarterly reports should include at a minimum: the date and time of the furnace fan speed deviation; the actual recorded furnace fan speed; the reason for the deviation; and any corrective actions taken.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04167 Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION cab brazing deoiling oven. CITY/TWP Dayton

SIC CODE 3585 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P099

EMISSIONS UNIT DESCRIPTION CAB Brazing Deoiling Oven, 0.8 mmBtu/hr natural gas fired, located in Bldg. 40B, Bay J-3

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	1.3 lbs/hr, 31.2 lbs/day	5.69	1.3 lbs/hr, 31.2 lbs/day	5.69
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT is compliance with the specified rules and regulations including the mass emission limitations, the 95% control efficiency requirement, as well as monitoring, record keeping and reporting requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 08-04167 Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION cab brazing deoiling oven. CITY/TWP Dayton

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and **electronic files to airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)

On February 18, 2000, DaimlerChrysler, Dayton Thermal Plant (DTP) submitted a Synthetic Minor PTI application for all the de-oiling ovens located at its facility. The proposed Synthetic Minor PTI is identified as OEPA PTI No. 08-04146. Proposed PTI 08-04146 includes the CAB Brazing Deoiling Oven, emissions unit P099.

Due to time considerations with issuing a Synthetic Minor PTI, on March 31, 2000, DTP requested that we issue a separate PTI for the CAB Brazing Deoiling Oven, emissions unit P099. A separate PTI for emissions unit P099 would allow DTP to install and begin operation of emissions unit P099. However, DTP continues to request that emissions unit P099 be included in the Synthetic Minor PTI 08-04146.

The de-oiling ovens remove stamping oil from various automobile radiator and air conditioning parts (i.e., fins and kazoos). The configuration of this de-oiling oven, similar to all the ovens, involves parts going into the furnace and then directly into the cool down chamber. Emissions from the oven are captured and incinerated by a thermal oxidizer with a minimum destruction efficiency of 95%.

Within the last 8 months, we have had considerable discussions with DTP regarding the de-oiling ovens. Specifically, we have documented improper operation of a de-oiling oven which resulted in visible emissions, and we have discovered 3 de-oiling ovens which did not obtain requisite permits. In addition, we have discovered deficiencies, and since resolved these deficiencies, regarding the potential to emit analysis submitted to support the FESOP application.

During our discussions, we re-evaluated the applicable rules for the de-oiling ovens. There have been 3 previous PTI issued for de-oiling ovens at DTP. The first, PTI 08-3139, issued on September 8, 1994, indicates that the applicable rules are OAC rule 3745-7-17-07 and -11. The second, PTI 08-3194, issued on November 9, 1994, also indicates that the applicable rules are OAC rule 3745-7-17-07 and -11. The third, PTI 08-3945, issued on April 14, 1999, indicates that particulate emissions are very minor and thus inconsequential and the applicable rule is 3745-21-07(G) - compliance being the use of non-photochemically reactive materials. Due to these applicable rule inconsistencies, we discussed the

NEW SOURCE REVIEW FORM B

PTI Number: 08-04167

Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION cab brazing deoiling oven.

CITY/TWP Dayton

emissions units and the applicable rule with OEPA. It was determined that the applicable rule should be OAC rule 3745-21-07(G)(2). The applicable rule determination was based upon the use of liquid organic materials, which are most likely photochemically reactive materials, that do not come into contact with a flame and are not baked, heat-cured or heat polymerized in the presence of oxygen.

Issues regarding capture efficiency were also discussed. As mentioned earlier, we documented that visible emissions occurred from improper operation of a de-oiling oven, emissions unit P094. An investigation determined that the emissions were not being captured and aspirated to the thermal oxidizer, but rather were exiting through the adjacent cool down chamber. Therefore, to demonstrate proper capture efficiency of emissions from the furnace, the facility must demonstrate compliance with Method 204. In accordance with Method 204, the facility needs to demonstrate 100% capture by maintaining a minimum pressure differential within the furnace of 0.007 inches of water. According to the manufacturer of the oven, a furnace fan speed of 1515 rpm will maintain the required 0.007 inches of water pressure. Therefore, we have required the permittee to install a fan speed monitoring device and record the fan speed daily. In addition, the permittee is required to install and operate an alarm system that will immediately notify the operator when the fan speed is not at least 1515 rpm. The permittee must also record and submit quarterly reports of all instances that the alarm system identifies a furnace fan speed deviation. Furthermore, verification of compliance with Method 204 is necessary during the required compliance demonstration.

Standard language is also included for the thermal oxidizer. The requirement is to maintain a minimum, 3-hour average, combustion temperature within the thermal oxidizer of 1400 degree Fahrenheit. The "minimum" was added at DTP's request. The permittee must continuously monitor and record temperature and submit quarterly deviation reports.

Lastly, the permittee is required to conduct a compliance demonstration for mass emissions and destruction efficiency requirements (note that demonstrating 100% capture is inherent). The compliance demonstration is required to be conducted within 90 days of startup.

This de-oiling oven is not subject to Ohio EPA's Air Toxics Policy. According to the supplied MSDS for the lubricating oil there are no substances in the lubricating oil with a listed ACGIH TLV limit.

PTI Fee: Process Weight Rate - 0 to 1,000 lbs/hr = \$200.00

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

NEW SOURCE REVIEW FORM B

PTI Number: 08-04167 Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION cab brazing deoiling oven. CITY/TWP Dayton**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:****Calculations:****Maximum Lubrication Oil Throughput = 25 lbs/hr****Minimum Capture + Control Efficiency = 95%****Hourly Er = (25 lbs/hr)(1 - 0.95) = 1.25 lbs/hr or 1.3 lbs/hr****Daily Er = (1.3 lbs/hr)(24 hrs/day) = 31.2 lbs/day****Annual Er = (1.3 lbs/hr)(8760 hrs/yr)(1 ton/2000 lbs) = 5.69 TPY****Please complete:****TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**PollutantTons Per Year

VOC

5.69