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

12/10/2013

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

Tim McDaniel
Navistar, Inc. - SAP
6125 Urbana Road
P. O. Box 600
Springfield, OH 45502

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0812760220
Permit Number: P0115660
Permit Type: Administrative Modification
County: Clark

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
RAPCA; Indiana

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Navistar, Inc. - SAP

Facility ID:	0812760220
Permit Number:	P0115660
Permit Type:	Administrative Modification
Issued:	12/10/2013
Effective:	12/10/2013

Division of Air Pollution Control
Permit-to-Install
for
Navistar, Inc. - SAP

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Authorization

Facility ID:	0812760220
Facility Description:	heavy duty truck manufacturing
Application Number(s):	M0001829
Permit Number:	P0115660
Permit Description:	Administrative PTI modification for truck painting line to allow for the installation of new coating applicators that will reduce the volume of coating applied and reduce VOC emissions.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	12/10/2013
Effective Date:	12/10/2013

This document constitutes issuance to:

Navistar, Inc. - SAP
6125 Urbana Road
P. O. Box 600
Springfield, OH 45502

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0115660
Permit Description: Administrative PTI modification for truck painting line to allow for the installation of new coating applicators that will reduce the volume of coating applied and reduce VOC emissions.

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

Emissions Unit ID:	**K021**
Company Equipment ID:	TOP COAT LINES 157 & 158
Superseded Permit Number:	08-3475
General Permit Category and Type:	Not Applicable

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) 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 Regional Air Pollution Control Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Regional Air Pollution Control Agency. 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, andreportingrequirements contained in this permit shall be submitted to the Regional Air Pollution Control Agency 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 theRegional Air Pollution Control Agencyin 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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.

b) 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.

c) The permittee shall submit progress reports to the Regional Air Pollution Control Agency 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 Regional Air Pollution Control 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 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 Regional Air Pollution Control 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, 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)not exempt from the requirement to obtain a Permit-to-Install.

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 permittee 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 “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director 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.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon 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 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. 40 CFR Part 63, Subpart MMMM

   Emissions Units K013, K016, K017, K021, K026, K028, K038, K045 and K046 are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart MMMM).

   a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

      The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

      (1) all coating operations as defined in 40 CFR 63.3981;

      (2) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

      (3) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

      (4) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

      [Authority for term 40 CFR 63.3883, 40 CFR 63.3882(b), and 40 CFR 63.3940]

   b) The permittee, has chosen to use a combination of the “compliant material” and “without add-on control” options for these emissions units.

      (1) When using the “compliant material” option, the permittee shall not apply any coating in these emissions units with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3951 and 63.3952 for the compliance period.

(2) When using the "without add-on control" option, the permittee shall maintain these emissions units in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

[Authority for term 40 CFR 63.3891(a), 40 CFR 63.3900(a), 40 CFR 63.3940, 40 CFR 63.3941, and 40 CFR 63.3942 40 CFR 63.3950, 40 CFR 63.3951 and 40 CFR 63.3952]

c) The permittee shall comply with the applicable emissions limits operational limits and work practices of 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890	Emissions limits
63.3892(a)	Operating limits
63.3893(a)	Work Practices
63.6(e)(1)	Start up Shutdown and Malfunction Plan

d) The permittee shall comply with the applicable record keeping requirements of 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3930	Record keeping
63.3931	Records maintenance and duration
63.3940	Initial compliance demonstration date for compliant coatings
63.3941	Initial compliance demonstration procedures for compliant coatings
63.3942	Continuous compliance for compliant coatings
63.3950	Initial compliance demonstration without add-on controls
63.3951	Initial compliance demonstration procedures without add-on controls
63.3952	Continuous compliance without add-on controls

e) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3891(a)	Exceedance reporting for compliant coatings
63.3910	Notification requirements
63.3920(a)	Reporting requirements
63.3941(e)	Initial compliance reporting for compliant coatings
63.3951(e)	Initial compliance reporting without add-on controls

3. 40 CFR Part 63, Subpart PPPP

Emissions Units K013, K021, and K028 are subject to the NESHAP for Plastic Parts Surface Coating.

a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for HAP, work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

(1) all coating operations as defined in 40 CFR 63.4581;

(2) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

(4) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to the requirements and limitations of this NESHAP on April 19, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on April 30, 2008.

[Authority for term 40 CFR 63.4483, 40 CFR 63.4482(b), and 40 CFR 63.4540]

b) The permittee, has chosen to use a combination of the “compliant material” and “without add-on control” options for these emissions units.

(1) When using the “compliant material” option, the permittee shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

(2) When using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

[Authority for term 40 CFR 63.4491(a), 40 CFR 63.4500(a), 40 CFR 63.4540, 40 CFR 63.4541, 40 CFR 63.4542, 40 CFR 63.4550, 40 CFR 63.4551 and 40 CFR 63.4552]

c) The permittee shall comply with the applicable emissions limits operational limits and work practices of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4490(b)(1)	Emissions limits
63.4492	Operating limits
63.4493	Work Practices
63.6(e)(1)	Start up Shutdown and Malfunction Plan

d) The permittee shall comply with the applicable record keeping requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4530	Record keeping
63.4531	Records maintenance and duration
63.4540	Initial compliance demonstration date for compliant coatings
63.4541	Initial compliance demonstration procedures for compliant coatings
63.4542	Continuous compliance for compliant coatings
63.4550	Initial compliance demonstration without add-on controls
63.4551	Initial compliance demonstration procedures without add-on controls
63.4552	Continuous compliance without add-on controls

e) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4510	Notification requirements
63.4520	Reporting requirements

C. Emissions Unit Terms and Conditions

1. K021, TOP COAT LINES 157 & 158

Operations, Property and/or Equipment Description:

Miscellaneous metal parts topcoat line No. 157 and 158, with bake-oven and thermal incinerator

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) PTI 08-3475	The minimum volatile organic compounds (VOC) overall control efficiency shall be at least 85.5% from the coating line and minimum 90% destruction efficiency, for the thermal incinerator The VOC emissions from this emissions unit shall not exceed 34.6 pounds per hour and 553.3 pounds per day. The VOC content of the primers employed shall not exceed 6.10 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average. The VOC content of the clear coats employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average. The VOC content of all other coatings, (excluding primers and clear coats) employed shall not exceed 4.68 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-21-09(B)(6) and 40 CFR, Part 63, Subpart PPPP and 40 CFR, Part 63, Subpart MMMM
b.	OAC rule 3745-31-05(D) PTI 08-3475 (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) review)	The VOC emissions from this emissions unit shall not exceed 63.3 tons on a rolling 365 day basis, including primer coatings.
c.	OAC rule 3745-17-10(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound particulate per million Btu (mmBtu) actual heat input.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-21-09(B)(6)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-11(C)	e b)(2)c.
g.	40 CFR Part 63, Subpart MMMM, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period. See Section B.3
h.	40 CFR, Part 63, Subpart PPPP Surface Coating of Plastic Parts and Products [40 CFR 63.4490(b)(1)]	The organic HAP emissions from plastic parts coating in this emissions unit shall be limited to no more than 0.16 kg (0.16 lb) organic HAP per kg (lb) per kg (lb) of coating solids used during each 12-month compliance period. See Section B.4
i.	40 CFR Part 63, Subpart A MACT General Provisions	The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP.

(2) Additional Terms and Conditions

a. All VOC emissions from the booth and flash areas shall be vented to the thermal incinerator, except for VOC emissions resulting from the application of primer coatings.

b. The enclosure associated with this emissions unit is not a permanent total enclosure, as defined in 40 CFR Part 51, Appendix M, Method 204.

c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

c) Operational Restrictions

(1) The enclosure associated with this emissions unit shall be maintained under negative pressure when the emissions unit is in operation. The direction of the air flow through all natural draft openings shall be into the enclosure.

(2) The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour period of operation when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The most recent emissions test that demonstrated compliance was conducted on February 10, 2009 with an average combustion chamber temperature of 1650 ^{o}F. This combustion chamber temperature is subject to revision, if during the term of this permit, additional stack tests are conducted that demonstrated the emissions unit is in compliance.

(3) 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.

(4) 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.

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 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 for the thermal incinerator:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. 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 combustion temperature measured during the most recent emission test that demonstrated that the emissions unit was in compliance.

Upon detecting an excursion of the thermal oxidizer temperature indicator range listed in c)(2), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(2) The permittee shall collect and record the following information each day for the coating line:

a. The name, identification number and type (i.e., primer, clear, etc) of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon of coating, excluding water and exempt solvents.

c. The volume, in gallons, of each coating employed, excluding water and exempt solvents.

d. The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the primer coatings.

e. The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the clear coatings.

f. The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the coatings, excluding primer and clear coatings.

g. The total uncontrolled VOC emissions for all the coatings employed, excluding primer, in pounds or tons.

h. The total VOC emissions for all the primer coatings employed, in pounds or tons.

i. The calculated, controlled VOC emission rate for all the coatings, excluding primer, in pounds or tons per day. The controlled VOC emission rate shall be calculated using 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. (The last emissions test was conducted in

February 10, 2009 with an overall control efficiency of 90 percent. Until additional tests are conducted the overall control efficiency factor shall be 1 - 0.90.)

j. The total daily VOC emission rate, in pounds or tons, i.e., d)(h) plus d)(i)

k. The number of hours the emissions unit was in operation.

l. The average hourly VOC emission rate, in pounds per hour, i.e., d)(k) divided by d)(l).

m. The rolling, 365-day summation of the VOC emission rate, in tons, for all the coatings (including primer coatings).

[If only compliant coatings are employed in this emissions unit, the permittee does not have to calculate a daily, volume-weighted average VOC content for all the coatings employed.]

(3) The permittee shall collect and record each month the amount of purge solvent employed and the amount of emissions from the purge solvent, in pounds or tons. The amount emitted shall be calculated using an AP-42 emission factor of 1.42 pounds of VOC emissions per ton of solvent, from Table 4.7-1, and the overall control efficiency determined from the most recent emission test that demonstrated that the emissions unit was in compliance.

(4) The permittee shall operate and maintain magnehelics which measure the pressure, in inches of water, in each airhouse. The magnehelics shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals with any modifications deemed necessary by the permittee.

(5) Streamers shall be employed to demonstrate that the air flow through the natural draft openings is into the enclosure, when the emissions unit is in operation.

(6) The permittee shall record the following information for each day when the emissions unit is in operation:

a. The direction of air flow through the natural draft openings shall be documented once per shift based upon visual inspections of the streamers, i.e., into or out of the enclosure.

b. The pressure in each air house associated with this emissions unit shall be documented once per shift, in inches of water.

c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment when the emissions unit is in operation.

(7) 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 appropriate Ohio EPA District Office or local air agency upon request.

(8) 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.

(9) 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.

(10) 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 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 appropriate Ohio EPA District Office or local air agency upon request.

(11) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were 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 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.

(12) Whenever the monitored values for inward air flow and negative pressure across the enclosure in c)(1) and/or the average temperature within the combustion chamber of the thermal oxidizer deviate from the indicator range specified in c)(2) the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated that the emissions unit was in compliance.

b. All exceedances of the average hourly VOC emission limitation of 34.6 pounds.

c. All exceedances of the daily VOC emission limitation of 553.3 pounds.

d. All exceedances of the rolling, 365-day VOC emission limitation of 63.3 tons.

e. any daily record showing that the waterwash control system was not in service or not operated according to manufacturers recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that any of the daily, volume-weighted average VOC contents exceeded the applicable limitations specified in b)(1). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

(3) The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include the following:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All periods of time, when the emissions unit was in operation, during which the air flow through the natural draft openings was not maintained into the enclosure.

c. All periods of time, when the emissions unit was in operation, during which the pressure in each air house was not negative.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify 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 quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

(5) The permittee shall submit annual reports that indentify:

a. the total volume, in gallons, of coatings employed and

b. the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 34.6 pounds per hour.

Applicable Compliance Method -

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

If requested, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

b. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 553.3 pounds per day.

Applicable Compliance Method -

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

c. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 63.3 tons on a rolling 365 day basis.

Applicable Compliance Method -

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

d. Emission Limitation -

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method -

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the oven associated with this emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the oven associated with this emissions unit (mmBtu/hour).

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

e. Emission Limitation -

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method -

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

f. Emission Limitations -

The VOC content of the primers employed shall not exceed 6.10 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

The VOC content of the clear coats employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

The VOC content of all other coatings, (excluding primers and clear coats) employed shall not exceed 4.68 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

Applicable Compliance Method -

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

In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

(1) None.