



State of Ohio Environmental Protection Agency

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1000

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

09/18/97

08-12-10-0223

Navistar International Body Plant
Mr. Richard Cutrell
2069 Lagonda Avenue
Springfield, OH 45503

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

Dear Richard Cutrell:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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 of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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

If you have any questions, please contact the RAPCA at (937) 225-4435

Very truly yours,

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

cc: RAPCA
Jim Orlemann, DAPC Engineering

Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/18/97

Facility ID: 08-12-10-0223

Expiration Date: 09/18/00

FINAL ISSUE

This document constitutes issuance for: Navistar International Body Plant
2069 Lagonda Avenue
Springfield, OH 45503

of a permit to operate for:

B003 (Boiler # D-4310-3)
79.6 MMBTU/hr natural gas and no. 2 fuel oil boiler

PART I General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

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. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

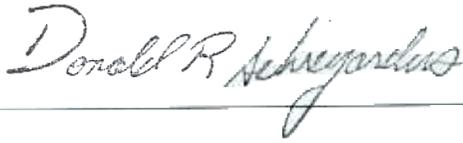
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Boiler - natural gas and No. 2 fuel oil (79.6 MMBTU/hr maximum capacity)	3745-17-10(B)(1)	0.020 pound of particulate emissions per MMBTU actual heat input
	3745-17-07(A)	Opacity shall not exceed 20 percent except for one six-minute period in any hour when up to 60 percent is permissible
	3745-35-07	0.52 pound sulfur dioxides per MMBTU actual heat input, when burning No. 2 oil
		0.0006 pound of sulfur dioxides per MMBTU actual heat input, when burning natural gas
		0.15 pound of nitrogen oxides per MMBTU actual heat input, when burning No. 2 oil
		0.14 pound of nitrogen oxides per MMBTU actual heat input, when burning natural gas

2. Additional Terms and Conditions

- 2.a The permittee operates three identical natural gas/No. 2 oil boilers identified by Ohio EPA IDs 0812100223 B001, B002 and B003. Each boiler has a maximum rated capacity of 79.6 MMBTU/hr.
 The maximum No. 2 oil usage for the three boilers combined shall not exceed 250,000 gallons based on a rolling, 12-month summation.
- 2.c The maximum natural gas usage for the three boilers combined shall not exceed 650 million cubic feet based on a rolling, 12-month summation.
- 2.d The emissions of nitrogen oxides from the three boilers combined shall not exceed 48.0 tons based on a rolling, 12 month summation.
 The emissions of sulfur dioxide from the three boilers combined shall not exceed 9.2 tons based on a rolling 12-month summation.

B. Operational Restrictions

1. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following No. 2 oil usage for the three boilers combined:

Months	Maximum, Cumulative Total No. 2 Oil Usage
	20,833 gallons
1-2	41,667 gallons
1-3	62,500 gallons
1-4	83,333 gallons
1-5	104,167 gallons
1-6	125,000 gallons
1-7	145,833 gallons
1-8	166,667 gallons
1-9	187,500 gallons
1-10	208,333 gallons
1-11	229,167 gallons
1-12	250,000 gallons

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual No. 2 oil usage limitation based upon rolling twelve-month summations.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following natural gas usage for the three boilers combined:

Months	Maximum, Cumulative Total Natural Gas Usage
1	54 MMCF
1-2	108 MMCF
1-3	162 MMCF
1-4	216 MMCF
1-5	270 MMCF
1-6	325 MMCF
1-7	379 MMCF
1-8	433 MMCF
1-9	488 MMCF
1-10	542 MMCF
1-11	596 MMCF
1-12	650 MMCF

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual natural gas usage limitation based upon rolling twelve-month summations.

3. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.
4. This emissions unit is permitted for natural gas and No. 2 fuel oil only. No other fuels shall be used in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate in lb/MMBTU.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

3

Facility Name: Navistar International Body Plant

Facility ID: 08-12-10-0223

4

Emissions Unit: Boiler # D-4310-3 (B003)

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain monthly records of the following information for emissions units B001, B002 and B003 combined:
 - a. the total amount of No. 2 oil burned (gallons);
 - b. the rolling, 12-month summation of the No. 2 oil usage (gallons);
 - c. the amount of natural gas burned (cubic feet);
 - d. the rolling, 12-month summation of natural gas usage (cubic feet);
 - e. the calculated emission rate of nitrogen oxides, in tons;
 - f. the rolling, 12-month summation of the nitrogen oxides emission rates, in tons;
 - g. the calculated emission rate of sulfur dioxides, in tons; and
 - h. the rolling, 12-month summation of the sulfur dioxide emission rates, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of:
 - a. the rolling, 12-month, No. 2 oil usage limitation;
 - b. the rolling, 12-month, natural gas usage limitation;
 - c. the rolling, 12-month, nitrogen oxides limitation;
 - d. the rolling, 12-month, sulfur dioxide limitation; and
 - e. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative No. 2 oil and natural gas usage levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.
2. The permittee shall also submit annual reports which specify (a) the total No. 2 oil usage, (b) the total natural gas usage, (c) the nitrogen oxides emissions, and (d) the sulfur dioxide emissions for emissions units B001, B002 and B003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
0.020 lb particulate/MMBTU actual heat input

Applicable Compliance Method -
For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (5.0 lbs particulate/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). For the use of No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (576.8 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs particulate/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr).
 - 1.b Emission Limitation -
0.52 lb SO₂/MMBTU actual heat input when burning No. 2 oil

Applicable Compliance Method -
Compliance shall be based upon the record keeping and analysis requirements specified in C.1 and C.2, and the use of the equation contained in OAC rule 3745-18-04(F)(2).
 - 1.c Emission Limitation -
0.0006 lb SO₂/MMBTU actual heat input when burning natural gas

Applicable Compliance Method -
Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (0.6 lb SO₂/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based upon conducting a stack test in accordance with USEPA Reference Method 6, of 40 CFR Part 60, Appendix A.

E. Testing Requirements (continued)

- 1.d Emission Limitation -
0.15 lb NO_x/MMBTU actual heat input when burning No. 2 oil

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (576.8 gal/hr) by the AP-42 emission factor for No. 2 oil (20 lb NO_x/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.

- 1.e Emission Limitation -
0.14 lb NO_x/MMBTU actual heat input when burning natural gas

Applicable Compliance Method -

Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (140 lb NO_x/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.

- 1.f Emission Limitation -
48 TPY NO_x

Applicable Compliance Method -

Compliance shall be determined by summing the nitrogen oxides emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The nitrogen oxides emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (20 lbs NO_x/1000 gallons), and dividing by 2,000 pounds per ton. The nitrogen oxides emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (140 lbs NO_x/MMCF), and dividing by 2,000 pounds per ton. The nitrogen oxides emissions shall be summed for each rolling 12-month period.

- 1.g Emission Limitation -
9.2 TPY SO₂

Applicable Compliance Method -

Compliance shall be determined by summing the sulfur dioxide emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (142 lb SO₂/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (0.6 lb SO₂/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions shall be summed for each rolling 12-month period.

- 1.h Emission Limitation -
20% opacity visible emission limitation, except for one six-minute period in any hour when up to 60% opacity is permissible

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/18/97

Facility ID: 08-12-10-0223

Expiration Date: 09/18/00

FINAL ISSUE

This document constitutes issuance for: Navistar International Body Plant
2069 Lagonda Avenue
Springfield, OH 45503

of a permit to operate for:

B002 (Boiler # D-4310-2)
79.6 MMBTU/hr natural gas and no. 2 fuel oil boiler

PART General Terms & Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

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. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

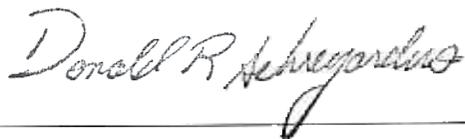
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, reading "Donald R. Schreyer", is written over a horizontal line.

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Boiler - natural gas and No. 2 fuel oil (79.6 MMBTU/hr maximum capacity)	3745-17-10(B)(1)	0.020 pound of particulate emissions per MMBTU actual heat input
	3745-17-07(A)	Opacity shall not exceed 20 percent except for one six-minute period in any hour when up to 60 percent is permissible
	3745-35-07	0.52 pound sulfur dioxides per MMBTU actual heat input, when burning No. 2 oil
		0.0006 pound of sulfur dioxides per MMBTU actual heat input, when burning natural gas
		0.15 pound of nitrogen oxides per MMBTU actual heat input, when burning No. 2 oil
		0.14 pound of nitrogen oxides per MMBTU actual heat input, when burning natural gas

2. Additional Terms and Conditions

- 2.a The permittee operates three identical natural gas/No. 2 oil boilers identified by Ohio EPA IDs 0812100223 B001, B002 and B003. Each boiler has a maximum rated capacity of 79.6 MMBTU/hr.
- 2.b The maximum No. 2 oil usage for the three boilers combined shall not exceed 250,000 gallons based on a rolling, 12-month summation.
- 2.c The maximum natural gas usage for the three boilers combined shall not exceed 650 million cubic feet based on a rolling, 12-month summation.
- 2.d The emissions of nitrogen oxides from the three boilers combined shall not exceed 48.0 tons based on a rolling, 12 month summation.
- 2.e The emissions of sulfur dioxide from the three boilers combined shall not exceed 9.2 tons based on a rolling 12-month summation.

B. Operational Restrictions

1. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following No. 2 oil usage for the three boilers combined:

Months	Maximum, Cumulative Total No. 2 Oil Usage
1	20,833 gallons
1-2	41,667 gallons
1-3	62,500 gallons
1-4	83,333 gallons
1-5	104,167 gallons
1-6	125,000 gallons
1-7	145,833 gallons
1-8	166,667 gallons
1-9	187,500 gallons
1-10	208,333 gallons
1-11	229,167 gallons
1-12	250,000 gallons

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual No. 2 oil usage limitation based upon rolling twelve-month summations.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following natural gas usage for the three boilers combined:

Months	Maximum, Cumulative Total Natural Gas Usage
1	54 MMCF
1-2	108 MMCF
1-3	162 MMCF
1-4	216 MMCF
1-5	270 MMCF
1-6	325 MMCF
1-7	379 MMCF
1-8	433 MMCF
1-9	488 MMCF
1-10	542 MMCF
1-11	596 MMCF
1-12	650 MMCF

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual natural gas usage limitation based upon rolling twelve-month summations.

3. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.
4. This emissions unit is permitted for natural gas and No. 2 fuel oil only. No other fuels shall be used in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate in lb/MMBTU.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain monthly records of the following information for emissions units B001, B002 and B003 combined:
- the total amount of No. 2 oil burned (gallons);
 - the rolling, 12-month summation of the No. 2 oil usage (gallons);
 - the amount of natural gas burned (cubic feet);
 - the rolling, 12-month summation of natural gas usage (cubic feet);
 - the calculated emission rate of nitrogen oxides, in tons;
 - the rolling, 12-month summation of the nitrogen oxides emission rates, in tons;
 - the calculated emission rate of sulfur dioxides, in tons; and
 - the rolling, 12-month summation of the sulfur dioxide emission rates, in tons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of:
- the rolling, 12-month, No. 2 oil usage limitation;
 - the rolling, 12-month, natural gas usage limitation;
 - the rolling, 12-month, nitrogen oxides limitation;
 - the rolling, 12-month, sulfur dioxide limitation; and
 - for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative No. 2 oil and natural gas usage levels.
- The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph (3) of the General Terms and Conditions.
2. The permittee shall also submit annual reports which specify (a) the total No. 2 oil usage, (b) the total natural gas usage, (c) the nitrogen oxides emissions, and (d) the sulfur dioxide emissions for emissions units B001, B002 and B003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
- 1.a Emission Limitation -
0.020 lb particulate/MMBTU actual heat input
- Applicable Compliance Method -
For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (5.0 lbs particulate/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). For the use of No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (576.8 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs particulate/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr).
- 1.b Emission Limitation -
0.52 lb SO₂/MMBTU actual heat input when burning No. 2 oil
- Applicable Compliance Method -
Compliance shall be based upon the record keeping and analysis requirements specified in C.1 and C.2, and the use of the equation contained in OAC rule 3745-18-04(F)(2).
- 1.c Emission Limitation -
0.0006 lb SO₂/MMBTU actual heat input when burning natural gas
- Applicable Compliance Method -
Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (0.6 lb SO₂/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based upon conducting a stack test in accordance with USEPA Reference Method 6, of 40 CFR Part 60, Appendix A.

4 Facility Name: Navistar International Body Plant
4 Facility ID: 08-12-10-0223
4 Emissions Unit: Boiler # D-4310-2 (B002)

E. Testing Requirements (continued)

- 1.d Emission Limitation -
0.15 lb NO_x/MMBTU actual heat input when burning No. 2 oil

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (576.8 gal/hr) by the AP-42 emission factor for No. 2 oil (20 lb NO_x/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.

- Emission Limitation -
0.14 lb NO_x/MMBTU actual heat input when burning natural gas

Applicable Compliance Method -

Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (140 lb NO_x/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.

- 1.f Emission Limitation -
48 TPY NO_x

Applicable Compliance Method -

Compliance shall be determined by summing the nitrogen oxides emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The nitrogen oxides emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (20 lbs NO_x/1000 gallons), and dividing by 2,000 pounds per ton. The nitrogen oxides emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (140 lbs NO_x/MMCF), and dividing by 2,000 pounds per ton. The nitrogen oxides emissions shall be summed for each rolling 12-month period.

- 1.g Emission Limitation -
9.2 TPY SO₂

Applicable Compliance Method -

Compliance shall be determined by summing the sulfur dioxide emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (142 lb SO₂/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (0.6 lb SO₂/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions shall be summed for each rolling 12-month period.

- Emission Limitation -
20% opacity visible emission limitation, except for one six-minute period in any hour when up to 60% opacity is permissible

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, E and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/18/97

Facility ID: 08-12-10-0223

Expiration Date: 09/18/00

FINAL ISSUE

This document constitutes issuance for:

Navistar International Body Plant
2069 Lagonda Avenue
Springfield, OH 45503

of a permit to operate for:

B001 (Boiler # D-4310-1)
79.6 MMBTU/hr natural gas and no. 2 fuel oil boiler

PART I General Terms & Conditions

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. 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.)

4. 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 three 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 the permit. Such records may be maintained in computerized form.

5. 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 and federal 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.

6. 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 unit 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

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

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. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

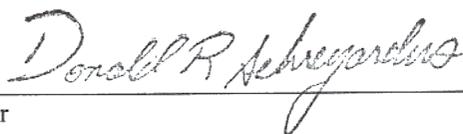
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

10. The permittee is also subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Boiler - natural gas and No. 2 fuel oil (79.6 MMBTU/hr maximum capacity)	3745-17-10(B)(1)	0.020 pound of particulate emissions per MMBTU actual heat input
	3745-17-07(A)	Opacity shall not exceed 20 percent except for one six-minute period in any hour when up to 60 percent is permissible
	3745-35-07	0.52 pound sulfur dioxides per MMBTU actual heat input, when burning No. 2 oil
		0.0006 pound of sulfur dioxides per MMBTU actual heat input, when burning natural gas
		0.15 pound of nitrogen oxides per MMBTU actual heat input, when burning No. 2 oil
		0.14 pound of nitrogen oxides per MMBTU actual heat input, when burning natural gas

2. Additional Terms and Conditions

- 2.a The permittee operates three identical natural gas/No. 2 oil boilers identified by Ohio EPA IDs 0812100223 B001, B002 and B003. Each boiler has a maximum rated capacity of 79.6 MMBTU/hr.
- 2.b The maximum No. 2 oil usage for the three boilers combined shall not exceed 250,000 gallons based on a rolling, 12-month summation.
- 2.c The maximum natural gas usage for the three boilers combined shall not exceed 650 million cubic feet based on a rolling, 12-month summation.
- 2.d The emissions of nitrogen oxides from the three boilers combined shall not exceed 48.0 tons based on a rolling, 12 month summation.
- 2.e The emissions of sulfur dioxide from the three boilers combined shall not exceed 9.2 tons based on a rolling 12-month summation.

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate in lb/MMBTU.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil received for burning in this emissions unit. The permittee shall perform or require the supplier to