



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Interim Director

2/21/2014

Certified Mail

Roger Brown  
Chrysler Group LLC - Toledo North Assembly  
4400 Chrysler Drive  
Toledo, OH 43608-4000

Facility ID: 0448010414  
Permit Number: P0088135  
County: Lucas

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 2/17/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Toledo Department of Environmental Services





## Response to Comments

Facility ID:	0448010414
Facility Name:	Chrysler Group LLC - Toledo North Assembly
Facility Description:	Automotive and Light Duty Truck Assembly Plant.
Facility Address:	4400 Chrysler Drive Toledo, OH 43608-4000 Lucas County
Permit:	P0088135, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 02/20/2012. The comment period ended on 03/21/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

### 1. Topic: General Comments

#### a. Comment:

Throughout the working draft ROP there are still several instances where the vehicle production limitations applicable only to the Supplier Park paint shop facility are mentioned in relation to emission limitations. The pages in the draft ROP where this occurs are as follows:

- i. Page 162, item f
- ii. Page 167, item g
- iii. Page 168, item j and item 2(a)
- iv. Page 169, item 2(b)
- v. Page 171, item f
- vi. Page 177, item g. and item j
- vii. Page 178, item 2(a) and 2(b)
- viii. Page 179, item 2(c)
- ix. Page 180, item 1(b)
- x. Page 215, item 1(c)
- xi. Page 220, item f.1(a)
- xii. Page 265, item 2(e)
- xiii. Page 273, item h



- xiv. Page 274, item k
- xv. Page 280, item 3(a) and (b)

However, the draft ROP does not make it clear that the production limitations are not applicable to the TNAP facility. This issue was previously addressed in our formal comment letter submitted to you on September 27<sup>th</sup>, of 2011 and in follow-up comments. Accordingly, Chrysler again requests that the draft ROP be amended to state the following to avoid any confusion about which production limits apply to the two facilities (TNAP and Supplier Park).

*“The annual production limits included in the terms and conditions for this emission unit apply only to this emission unit due to its association with the Supplier Park operation. The production limits for this emissions unit should not be misconstrued to apply to any of the TNAP operations (including trim, chassis and final assembly) in any way.”*

Response:

We added the referenced language to the permits for the following Supplier Park emissions units: K402, K403, K407, K409, P401 and P402.

b. Comment:

In addition, this version of the working draft ROP appears to include many additional emission limitations or material based limitations beyond the current ROP that reference the less stringent reasonably available control technology (RACT) requirements found in Ohio’s air regulations (OAC 3745-21) for sources of VOCs. For example, in the section on K023 Topcoat, there is a limitation on the VOC content of the coatings that is based upon OAC rule 3745-21-09(C)(1)(c). However, Chrysler previously negotiated the current Title V ROP such that any federal best available control technology (BACT) or state best available technology (BAT) determinations were considered to supersede the RACT requirements. In this case, the applicable VOC emission limit of 8.63 lbs VOC per gallon of applied coating solids, was considered to supersede both the RACT limits in 21-09 as well as the applicable new source performance standards (NSPS). It was noted also that the applicable NSPS had superseded the RACT requirements as well. In both instances, OEPA agreed to eliminate the RACT requirements or include a statement that the limit in the ROP was more stringent than the RACT requirements. The amount of time and effort that was expended during the negotiations on the original ROP was substantial in this regard. Chrysler does not wish to re-visit each and every one of these issues during this or future renewals. Previously Chrysler provided examples of other automotive assembly plant Title V ROPs in Ohio that include language to the effect that one regulation or requirement is more stringent than the other. As an example, the following table is excerpted from Page 35 of 71 of the General Motors Lordstown Assembly Plant ROP Dated September 10, 2010 which specifically identifies each applicable regulation, but the ROP does not include all of the emission limitations which have been superseded by an NSR action:

d. OAC rule 3745-21-09(C)(1)(c) - The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

e. OAC rule 3745-17-11(B) - The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



f. 40 CFR Part 60, Subpart MM The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Chrysler is requesting that the numerous limits identified in the sections related to coating operations be streamlined and simplified consistent with the above language in the GM Lordstown ROP.

Response:

At the instruction of Ohio EPA we replaced the SIP and NSPS pounds per gallon of applied coating solids requirement with the "less stringent than" term where appropriate.

We are not aware that the OEPA or the USEPA considers an applicable SIP requirement to be superceded by the authority of the NSPS, BAT or BACT emission limits. We are able to replace the applicable emissions limitations with the statement "less stringent than" in instances where the emissions limitations are clearly less stringent. With reference to the permit for K023 cited; the reference to OAC rule 3745-17-07(A)(1) appropriately includes the requested "less stringent" language because if the company maintains compliance with the 5% BACT opacity restriction it is always not possible to exceed the 20% SIP opacity restriction. In the K023 permit, the BACT VOC limitation is based on a monthly average, the SIP requirements are based on daily averages. If it is not possible to exceed the daily averaged RACT limitation of OAC rule 3745-21-09(C) under any operating scenario by maintaining compliance with the monthly averaged BACT limit, and compliance with the SIP monitoring, recordkeeping and reporting requirements of OAC rule 3745-21-09(C) are met, we may substitute "less stringent than" for the SIP limitation.

Should Chrysler submit such a demonstration, we will be able to replace the stated daily limitation with the requested "less stringent" language, however we will be unable to approve the removal of the references to the applicable rules or the associated rule required monitoring recordkeeping and reporting.

On review of the those rule required reporting requirements, it was noted that the proposed library terms and conditions did not accurately reflect the language of OAC rule 3734-21-09(C)(4), and the reporting terms were revised as follows:

"The permittee shall notify the Director (Toledo Division of Environmental Services) of any daily record indicating that the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating, excluding water and exempt solvents, or pounds of VOC per gallon of deposited solids on a daily basis exceeded the emissions limitation specified in OAC rule 3745-21-09(C)(1)(c). The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environmental Services) within thirty days following the end of the calendar month."

c. Comment:

There are a substantial number of additional or more aggressive inspection requirements for particulate filtration systems associated with paint repair operations and other insignificant particulate matter sources. Chrysler conducted a review of other ROPs for similar sources that OEPA has issued and notes that these inspection requirements appear unique to the Chrysler TNAP facility. We do not believe that the operation of our facility and these emission units warrant more stringent or substantially more frequent monitoring than other similar facilities in Ohio. If there is a reason that TNAP is viewed differently or its operation more concerning than these other facilities, please provide such information. Otherwise, Chrysler respectfully



requests that the TNAP facility be afforded the same level of compliance requirements and operation flexibility provided to other similar operations. Accordingly, absent any unique reasons, the periodic inspection requirements associated with these filtration systems should be removed. We have attempted to identify these requirements in the following emission unit specific comments as well.

Response:

This comment is based on recent SIP changes in required monitoring, recordkeeping and reporting requirements related to the newly approved OAC rule 3745-17-11(C). We will defer comment to the emissions unit specific requests which follow in K021, K022, K023, K029 and K407.

**2. Topic: B402 - Up to 45 natural gas air supply make up units**

a. Comment:

The emission factor identified in B402, Section b(1)(a) for Carbon Monoxide (CO) emissions is listed as 0.083 lbs of CO per million British thermal units (lbs/MMBtu). However, Chrysler previously provided information from the USEPA FIRE database that suggests that CO emissions from small natural gas-fired units such as air supply make-up units are more appropriately represented by an emission factor of 0.02 lbs/MMBtu. The FIRE factor is noted in previous sections of the draft ROP as well. Chrysler requests that the factor be changed to 0.02 lbs CO/MMBtu in this section as well as in Section f(1)(b), f(1)(c) and f(1)(d) under "Testing Requirements".

Response:

We added the referenced language to Section f(1)(b).

We are unable to revise the emission factor identified in B402, Sections b(1)(a), f(1)(c) and f(1)(d) through a Title V permit action. While we have no objection to utilizing the FIRE database emissions factors, PTI 04-1359 established 0.083 pound of carbon monoxide per mmBtu as BAT for this emissions unit. The submittal of a PTI modification request will be required to revise this determination.

b. Comment:

The emission factor identified in B402 Section b(1)(a) for SO<sub>2</sub> refers to "0.0006 pound year of sulfur dioxide per MMBtu. Please eliminate the term "year" from the factor.

Response:

Ohio EPA concurs with your request. The requested change has been made.

**3. Topic: F001 - Plant Roadways and Parking Lots**

a. Comment:

Chrysler compared the testing requirement specified on Page 54 of 284 to the existing ROP and notes that there is a new requirement in this version of the draft ROP. The draft ROP renewal now requires a calculation to be performed demonstrating compliance with the emission limits for roadways based upon AP-42 emission factors and equations, whereas in the previous version of the ROP, the compliance demonstration stated the following:



*“Compliance with the best available control measures specified in section A.I.1 shall be considered an adequate demonstration of compliance.”*

Chrysler has received no explanation as to why this language has been changed. Since the original emission estimates for this source may or may not have been based upon the AP-42 equations referenced and since Chrysler does not record hourly traffic rates necessary to perform the calculations, it is imperative that the language from the original ROP be re-incorporated into this draft or that a detailed explanation as to why this new requirement is necessary be provided. Chrysler reviewed recent Title V permits issued to other entities in Lucas County and identified the GM Transmission Plant in Lucas County as one that was issued by the TDES in March of 2010 (Permit #P0106044) and actually characterized paved roadways as an insignificant emission unit. Chrysler fails to understand how roadways at the TNAP facility are so substantially different that it would warrant amending the requirements in the ROP such that complex calculations are needed, yet in the same county and time frame, all of the requirements for another facility are entirely eliminated from the ROP.

This same comment applies to F401 on Page 60 of the draft Title V Permit.

Response:

We will be unable to revise the draft permit to match the previously issued Title V terms. If the original emission estimates for this source were not based upon the AP-42 equations referenced, we will consider replacement of the AP-42 terms as an alternate means for the demonstration of compliance with the emissions limitation. We are able to add the conditional phrase “if required” to clarify that a continuous demonstration of compliance by the calculation based upon AP-42 emission factors and equations is not a permit requirement.

The language cited is that which the Ohio EPA recommends for federally enforceable in all paved roadway permits, and the full terms and conditions may be found as included in the Ohio EPA’s website for General Permits. Ohio EPA requires us to review and update permit terms and conditions at renewal as a part of their policy of permit uniformity.

F001 is permitted at an emissions level of 0.32 pound per hour and 1.4 tons per year of PM10 with an allowance of 95% control for compliance with the BACT control measures. Since the emissions limitation was established under the authority of OAC rule 3745-31-10 through 20, OAC rule 3745-15-05(C)(1) excludes applicability of the permit exemption under De Minimis section of OAC rule 3745-15-05(D). OAC rule 3745-77-01(V)(3) defines an insignificant source as “Any emission unit with uncontrolled potential emissions of five tons or less per year of any regulated air pollutant other than a hazardous air pollutant”.

To revise this permit to take advantage of the insignificant source determination, the company should submit demonstrations of uncontrolled potential emissions of five tons or less which include PE as a regulated air pollutant.

This same response applies to F401.

#### **4. Topic: G002, Gasoline Storage**

a. Comment:

In previous comments on this issue, Chrysler indicated that G002 had been replaced by G401 and that only the 20,000 gallon tank should be addressed by G002. In the March 2011



communications regarding this matter, TDES indicated that the requested changes would be made to this emission unit. However, this version of the draft ROP still contains language related to stage II controls and ORVR, and the permit requires recordkeeping that includes identifying whether each vehicle which receives dispensed gasoline uses ORVR technology. Chrysler believes that this requirement is obsolete since all vehicles are now relying on ORVR technology and should be eliminated.

Response:

This emissions unit (G002) no longer exists. It is inappropriate to issue a permit for this source. Please update your facility profile.

We understand the Stickney Road gasoline dispensing facility associated with this emissions unit has been removed from service and the underground storage tank is currently being shared by emissions units G003 and G401. Ohio EPA associates the tank emissions with the related dispensing system, and as such this emissions unit should no longer exist in the state system as G002. The company has an obligation to update the facility profile to reflect the removal of the emissions unit through the eBusiness Center. This action will allow the deletion of the G002 terms and conditions from this permit.

**5. Topic: G003**

a. Comment:

These same comments apply to G003 beginning on Page 69 of 284.

Response:

G003 has been revised to more closely match the terms and conditions of G401. Alteration of a BAT determination or operating restriction should be done as a PTI modification.

The underlying requirement for stage II vapor recovery was established by the BAT determination of OAC rule 3745-31-05(A)(3) in PTI 04-1102 as last modified September 8, 2005. This determination allows the usage of the equivalent to stage II vapor recovery, and no monitoring recordkeeping or reporting requirements were formalized in the PTI. This emissions unit is excluded from applicability of OAC rule 3745-21-09(DDD) by the provisions of OAC rule 3745-21-09(A)(4). Therefore we are not aware of any difficulty which would prevent a change in the permit terms and conditions, and the terms and conditions will be modified to closely match G401.

**6. Topic: G401, Gas Fill**

a. Comment:

Chrysler believes that the structure and terms and conditions associated with this emission unit are appropriate and accordingly, the conditions associated with G002 and G003 should be made consistent with the terms for G401.

Response:

G003 has been revised to more closely match the terms and conditions of G401.



**7. Topic: K021, E-Coat**

a. Comment:

Chrysler recently submitted a PTI application, and received a draft PTI that has been noticed for public comment that included revised heat input levels for the E-Coat oven. In the current draft Title V the oven is noted as having a heat input rating of 26.0 MMBtu/hr. As a result of the PTI revision, this heat input rating should be 36.0 MMBtu/hr and all emission limits should be adjusted accordingly. Chrysler requests that the OEPA and TDES make the appropriate revisions to this draft ROP based upon the PTI revisions prior to finalizing the Title V permit.

Response:

OEPA concurs and the PTI P0110267 issued 7/25/12 changes have been made to the TV permit.

b. Comment:

Under Section e(2), the reporting requirements state the following:

- i. The permittee shall submit quarterly reports to the Director (Toledo Division of Environmental Services) the following records:
  - i. the operating time for the capture (collection) system(s), control device(s), monitoring equipment, and the associated emissions unit;
  - ii. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. If no such periods of deviation occur, the permittee shall submit a negative report; and
  - iii. 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 (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(m) and 40 CFR 60.395]

Chrysler previously proposed a revision to the operating time requirements in item 1) since they are substantially more burdensome than requirements in the current ROP that are applicable to the control devices associated with the E-coat oven, and have no regulatory basis from which to refer to. In previous communications, TDES indicated that this emission unit is subject to VOC emissions limitations under OAC rule 3745-21-09(C)(1)(a)(ii) through (iv) and that compliance with this applicable rule requires the recordkeeping specified in OAC rule 3745-21-09(B)(3)(j) and subjects the permittee to the reporting requirements of OAC rule 3745-21-09(B)(3)(m). Reporting of the operating time for the capture (collection) system(s), control device(s), monitoring equipment, and the associated emissions unit is a requirement of OAC rule 3745-21-09(B)(3)(m).

As mentioned above, this operation was subject to BACT pursuant to federal New Source Review at the time the original permit to install was issued which is far more stringent than the



current RACT requirements in 3745-21-09 (i.e., the current limit is 0.23 pounds per gallon of applied solids on a monthly volume weighted average). Chrysler has requested that the RACT and NSPS requirements merely be noted as being less stringent than the stated emission limits resulting from the NSR review. Furthermore, the coating operations associated with E-coat, guidecoat and topcoat are all addressed under the USEPA Protocol for Determining the Daily VOC Emission Rate of Automobile and Light Duty Truck Topcoat Operations (Topcoat Protocol). The Topcoat Protocol was recently updated and includes specifics related to control devices.

Finally, the GM Lordstown ROP renewal issued by OEPA in the fall 2010 does not include the requirement to submit the information for the operating time on a quarterly schedule. As a result, Chrysler requests that this language be revised to merely state that the records will be kept and made available to OEPA upon request.

Response:

The referenced reporting requirement is currently stated as appropriate to the requirements of OAC rule 3745-21-09(B)(3)(m). We agree that compliance with the monitoring and reporting requirements for "was below the average temperature during the most recent emission test" will also reveal any excursion which "was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature". We have therefore removed the 50 degree requirement from the permit.

We will be unable eliminate the other SIP required monitoring and reporting requirements. However as the operation is designed to shutdown should the control system fail (electrically interlocked to prevent the entrance of vehicles to the drying oven during a period of control failure), we are able to accept as adequate reporting, either a statement indicating that "at no time did the drying oven operate without control", or a report that states that "the paint line operated for XXX minutes without control on YYY dates during a period of shutdown caused by an incinerator malfunction".

Please note that where an incinerator is utilized as a control device, OAC rule 3745-21-09(B) is consistent in its requirement for recordkeeping and reporting of the incinerator operating time. This section does allow for a permittee to request the removal of the reporting requirement under the authority of OAC rule 3745-21-09(B)(5). Also if Chrysler demonstrates compliance with the SIP limitations of OAC rule 3745-21-09(C)(1)(a)(ii) through (iv) without control, applicability of OAC rule 3745-21-09(B)(3)(m) could be avoided.

c. Comment:

We note that the operation of the oxidizer is limited to a temperature that is no less than that which was measured during the most recent performance test and the draft ROP includes the following language:

- i. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

However, the previous version of the ROP allowed for a 50 degree variance based upon a three-hour average. This 50 degree variance is also noted in the Monitoring and



Recordkeeping requirements in item (3) h and both the operating requirements and monitoring requirements should be consistent. This same issue was addressed in the GM Lordstown comments and the response from the OEPA was that the ROP was corrected pursuant to GM's comments (see excerpt from GM Lordstown Permit below). Accordingly, Chrysler requests that the operational flexibility provided by the temperature variance be re-incorporated into the draft permit for all conditions addressing oxidizer temperature (i.e., K021, 22, 23, etc.)

*"c. Comment: Section C.2 (K017, Cathodic EDP Prime Coating System), Condition C.2.c.4 – The previous Title V Permit allowed not more than 50 degrees below the average temperature during the most recent emissions test that demonstrated the emission unit was in compliance. Removing the allowance to operate up to 50 degrees below the average temperature during the most recent emissions test that demonstrated compliance is inconsistent with C.2.d.2.k. The operational flexibility in the current Title V permit needs to be restored. The particular language to be re-inserted is contained in the attached draft permit".*

*"d. Response: This was corrected per your comment."*

Response:

After review of the historic records, the references for the temperature requirements have been revised to reflect a determination made under the authority of OAC rules 3745-31-10 through 20.

The BAT determination of K017 at the GM Lordstown facility was established as a temperature "not more than 50 degrees below". BACT for this emissions unit was established as "not be below the average temperature measured during the most recent performance test". This emissions limitation appears in the original PTI for this source (PTI 04-1102 dated June 26, 1998) and carries over unchanged in the current draft modified permit to install. The "not be below the average temperature" monitoring term is considered to be appropriate to this emissions unit.

Chrysler may request a review of the 1998 BACT determination, consistent with comments made during a March 29, 2012 meeting with the TDOES. It should be noted that the 1998 permit was issued draft with the 50 degree temperature allowance. The permit was revised to the present form prior to issuance as a final permit based on comments received from USEPA which resulted in the addition of this term along the establishment of 100% capture and 95% control as BACT requirements. USEPA submitted documentation at that time establishing this level control as a requirement at other automotive assembly plants.

**8. Topic: K022, Powder Anti-chip**

a. Comment:

Chrysler recently submitted a PTI application, and received a draft PTI that has been noticed for public comment that included revised heat input levels for the Powder Anti-chip oven. In the current draft Title V the oven is noted as having a heat input rating of 35.8 MMBtu/hr. As a result of the PTI revision, this heat input rating should be 41.8 MMBtu/hr and all emission limits should be adjusted accordingly. Chrysler requests that the OEPA and TDES make the appropriate revisions to this draft ROP based upon the PTI revisions prior to finalizing the Title V permit.



Response:

Ohio EPA concurs and PTI P0110267 issued 7/25/12 has been updated into TV permit.

b. Comment:

Chrysler notes that the emission limits applicable to the powder anti-chip operation included in the working draft ROP reference the RACT limits in OAC 3745-21-09 which includes a daily pounds VOC per gallon of applied coating solids (lbs/GACS) value. The RACT CTG that is the basis for the rule was developed prior to any widespread use of powder coatings. In addition, the applicable NSPS in 40 CFR 60 Subpart MM superseded the RACT requirements and was identified in the current ROP as being more stringent than the RACT requirements. It specifically states:

*"The permittee has provided supplemental information that indicates that the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 3745-31-20."*

In addition, the following excerpt is from the recent renewal of the GM Lordstown which was renewed on September 10, 2011 and applies to powder guidecoat addressed on Page 47 of 71:

- c. OAC rule 3745-21-09(C)(1)(a)(v) The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. 40 CFR Part 60, Subpart MM The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-28 and 3745-31-05(A)(3).

Chrysler requests that the recent NSR decisions supporting BACT/LAER determinations be recognized as more stringent than the old RACT requirements and NSPS requirements and that the permit not be made unnecessarily more complicated than it needs to be. Since OEPA is consistent in its treatment of this issue for other automotive assembly plant operations (e.g., GM Lordstown), Chrysler requests the same for the TNAP ROP renewal. Furthermore, the requirement to determine a pounds VOC per gallon of applied coating solids on a daily basis for an old RACT requirement is inappropriate for the powder anti-chip operation since the operations relies on one coating formulation (i.e., coating does not change) and the transfer efficiency does not fluctuate enough to require daily records.

Response:

At the instruction of Ohio EPA we replaced the SIP pounds per gallon requirement with the "less stringent than" term for this emissions unit.

Where OAC rule 3745-21-09(C)(1)(a)(v) is applicable, OAC 3745-21-09(C)(4) specifies the compliance requirements. We agree that the limitation in OAC rule 3745-21-09(C)(1)(a)(v) does not appear to have been developed with consideration to the use of powder coatings.

We are not aware that the OEPA or the USEPA considers an applicable SIP requirement to be superseded by the authority of the NSPS, BAT or BACT emission limits. We are able to replace the applicable emissions limitations with the requested "less stringent" language, however we will be unable to approve the removal of the references to the applicable rules or the associated rule required monitoring recordkeeping and reporting.



9. Topic: K023, Topcoat

a. Comment:

Chrysler recently submitted a PTI application, and received a draft PTI that has been noticed for public comment that included revised heat input levels for the Topcoat oven. In the current draft Title V there are two ovens noted as having a heat input rating of 22.2 MMBtu/hr each. As a result of the PTI revision, the combined heat input rating should be 50.4 MMBtu/hr (25.2 MMBtu/hr each) and all emission limits should be adjusted accordingly. Chrysler requests that the OEPA and TDES make the appropriate revisions to this draft ROP based upon the PTI revisions prior to finalizing the Title V permit.

Response:

Ohio EPA concurs and have revised TV permit to include PTI P0115997 issued 1/2/2014.

b. Comment:

Chrysler notes that the emission limits applicable to the topcoat operation included in the working draft ROP reference the RACT limits in OAC 3745-21-09 which includes a daily pounds VOC per gallon of applied coating solids (lbs/GACS) value. The applicable NSPS in 40 CFR 60 Subpart MM superseded these RACT requirements and was identified in the current ROP as being more stringent than the RACT requirements. It specifically states:

*“The permittee has provided supplemental information that indicates that the emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 3745-31-20.”*

It should also be noted that the NSPS was superseded by the applicable emission limit resulting from the NSR BACT review (8.63 lbs VOC/GACS) conducted as part of the original permit to install for the TNAP facility. Accordingly, Chrysler requests that the daily RACT limit of 15.1 lbs VOC/GACS be eliminated both the emission limits table and in the following sections related recordkeeping, reporting, monitoring and testing. This is consistent with the current ROP.

Similar to previous comments on supercession issues, Chrysler requests that the recent NSR decisions supporting BACT/LAER determinations be recognized as more stringent than the old RACT requirements and NSPS requirements and that the permit not be made unnecessarily more complicated than it needs to be. Since OEPA is consistent in its treatment of this issue for other automotive assembly plant operations (e.g., GM Lordstown), Chrysler requests the same for the TNAP ROP renewal.

Response:

Please refer to the similar issue for K021.

c. Comment:

This section of the draft ROP requires periodic and annual inspections of the waterwash system that is used to maintain the humidification and cleanliness of the topcoat coating operations. Chrysler believes that requiring such inspections and recordkeeping indicating the inspections have been completed and the results of the inspections is not necessary. The waterwash system is inherent to the booth design and the booth cannot operate properly without the humidification provided by the waterwash.



Response:

The terms and conditions cited are those recommended by the Ohio EPA as formalized in the permit terms and conditions library accessible at <http://www.epa.ohio.gov/> for emissions unit subject to OAC rule 3745-17-11(C)(1),(C)(2) and are based on the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g). This section requires the installation of “particulate control” and specifies the associated “work practices” as an applicable requirement, rather than setting an “emissions based limitation”.

Please note that BAT for PTI 04-1102 as originally issued set limitations for PM10 only. As defined in 3745-17-01 particulate emissions (PE) are those which are measured by a M5 test. The appropriate test for PM10 is M201 and 202. On review of the background documents; the PM10 limits were set as BACT and were intended to be “more stringent than” the SIP requirements of OAC rule 3745-17-11(B)(1). It has been determined by the action of the ERAC case no. 995700 that the appropriate particulate emissions limitation for this emissions unit is as follows:

OAC rule 3745-17-11(C)(3)          exemption from work practice requirements

OAC rule 3745-31-05(D)          15.63 lb/hr of particulate emissions as PM10

The increased allowable emission will require a revision of the annual PM10 limitation to 68.46 tons per year. Testing performed May 11 and 12 of 2005 demonstrated an average emissions rate of 1.21 lb/hr as PE. No additional testing is anticipated at this time.

Therefore, the facility is exempted from the work practice requirements of OAC rule 3745-17-11(C) due to the emission limitation in OAC rule 3745-31-05(D) per OAC rule 3745-17-11(C)(3). The Title V permit has been revised to exempt these requirements.

**10. Topic: K027, Blackout**

a. Comment:

This section requires periodic inspections and recordkeeping for the dry filtration system used for paint overspray from the blackout operations. Chrysler requests that the language be tied to the operation of the blackout booth. In other words, the annual inspections should only be required during a calendar year if the booth operated during that year. The blackout operation is such that the booth may not operate for an extended period of time.

Response:

Ohio EPA concurs and has added language to the TV permit to address this situation.

**11. Topic: K029, Interior Touch-up**

a. Comment:

This section requires periodic inspections and recordkeeping for the dry filtration system used for paint overspray from the interior touch-up operations. Chrysler requests that the language requiring the inspections be eliminated as this operation by its nature (touch-up) does not generate enough overspray or emissions such that inspections are warranted. This same comment applies to K024.



Response:

The exemption for OAC rule 3745-17-11(C) per OAC rule 3745-17-11(C)(3) applies and this change has been made to the TV permit.

b. Comment:

Page 154 of 284, item (3) includes reference to a VOC limit of 2.0 pounds per gallon, excluding water and exempt solvents. This appears to be a typographical error as the correct limit is 4.8 pounds per gallon as presented in the table under applicable emissions limitations.

Response:

Ohio EPA concurs and the changes have been made to the TV permit.

**12. Topic: K401, Off-line Repair Booth**

a. Comment:

This operation is located in the Supplier Park Paint facility. Please remove this emission unit from the draft ROP.

Response:

This emissions unit was listed as not installed in the 0448010414 facility profile and was invalidated based on your request to remove the source from the permit.

**13. Topic: K407, Clean Shop Repair**

a. Comment:

In the "Applicable Emission Limitations and/or Control Requirements" Table, there is a reference to emissions of PE from the stack. The clean shop repair operations do not rely on exhaust stacks. Please remove the reference to a stack.

Response:

We will be unable to revise the permit as requested.

Our records indicate that this emissions unit is controlled by a dry fabric filtration system. OAC rule 3745-17-01(B)(22) gives the following definition: "Stack" means any chimney, flue, conduit or duct, including the outlet of any air pollution control equipment, which is arranged to conduct emissions to the ambient air." The outlet of the filtration system is considered a stack. Engineering Guide 75 further clarifies that "by definition any discharge from control equipment is deemed to be from a stack or stacks. This includes any control equipment that is vented inside a building having non-stack openings."

**14. Topic: K407, Clean Shop Repair**

a. Comment:

On page 177, the emission limit of 0.4 pound VOC per hour in item (i) does not include the typical language for an "Applicable Compliance Method".



Response:

Ohio EPA concurs and the TV permit has been revised.

**15. Topic: P008, Sealers and Adhesives**

a. Comment:

The current annual VOC limit is identified as 55.06 tons per year. However, PTI 04-1102 was revised in 2011 and the revised emission limit is now 77.49 tons VOC per year. Please revise the limit accordingly.

The most recent PTI issued in 2011 and the current draft PTI out for public comment includes a sealer gel oven with a heat input level of 12 MMbtu/hour. Please include the provisions of the gel oven PTI terms and conditions in the draft ROP prior to finalization of the document.

Response:

The allowable VOC emissions will be corrected. The terms related to "photochemically reactive" based on requirements of the vacated OAC rule 3745-21-07 rules have been removed from the permit. The terms and conditions for P008 in the latest PTI cannot be incorporated into the TV permit until a revised TV permit application has been submitted.

Ohio EPA had contacted facility on 1/8/2014. The facility confirmed that the 55.06 tons of VOC per year is the correct emission limit. Therefore no change to the permit was required.

**16. Topic: P010, Plant-wide Miscellaneous Solvents and Cleaners**

a. Comment:

The original inclusion of this emission unit was to address photo-chemically reactive regulatory requirements which have since been revised pursuant to recent changes to OAC 3745-21-07. Accordingly, Chrysler believes that this emission unit can be eliminated from the draft ROP.

Response:

P010 can be eliminated on the issuance of an appropriate permit-to-install modification for P009.

Due to the recent removal of the applicability of OAC rule 3745-21-07, we believe that it would be appropriate to merge the requirements of P009 for "miscellaneous solvents and solvent body wipes applied to metallic surfaces" with the requirements for P010 for "solvents and cleaners which are being applied to non-metallic surfaces and are not associated with a permitted source. We look forward to the receipt of your permit-to-install modification request.

Ohio EPA agreed with the facilities assessment. Accordingly, P007, P008, and P010 were consolidated under emission unit P007. PTI modification P0115680 issued 12/30/2013 consolidated all emissions under P007. These changes were made in the TV permit.



**17. Topic: P011 , BIW Inspection and Grinding**

a. Comment:

The requirements for inspection of the particulate matter controls have been changed such that there is an increase in frequency from the most recent version of the TNAP Title V ROP. Chrysler is not aware of any issues with PM controls for this unit and therefore respectfully requests that the frequency be based upon the currently applicable ROP which allows weekly inspection that graduate to monthly.

Response:

Based on the March 30, 2012 submittal of visible emission results from January 2005 to date Ohio EPA has determined that a tiered approach of monitoring from weekly to monthly is appropriate for this emissions unit, as a case-by-case determination. As no monitoring or recordkeeping was specified in PTI 04-01102, as issued 9/8/2005, the change will appear only in the TV terms and conditions

**18. Topic: P012 , Finish Welding**

a. Comment:

The requirements for inspection of the particulate matter controls have been changed such that there is an increase in frequency from the most recent version of the TNAP Title V ROP. Chrysler is not aware of any issues with PM controls for this unit and therefore respectfully requests that the frequency be based upon the currently applicable ROP which allows weekly inspection that graduate to monthly.

Response:

Ohio EPA concurs, PTI P0115653 issued 12/17/2013 made the requested changes and the same changes were made in the TV permit.

**19. Topic: K008. K009 and K010 – Clean Shop Repair Booths**

a. Comment:

The requirement to conduct inspections of the clean shop repair operation filtration system is not necessary. By virtue of the operation (clean shop) dust and related materials are kept to a minimum due to the fact that the vehicle finish cannot be allowed to be impacted by such materials, hence the name "clean shop". These units utilize filtration systems that exhaust indoors. Accordingly, Chrysler requests that the inspection requirements for these units be eliminated. It should be noted that these requirements were not included in the currently applicable ROP.

Response:

The BAT determinations of OAC rule 3745-31-05(A)(3) in PTI 04-747 did not address PE from these sources, therefore the exemption of OAC rule 3745-17-11(C)(3) is not applicable to these emissions units. Engineering Guide #75 establishes this source as being regulated by 17-11. The terms and conditions cited are those recommended by the Ohio EPA as formalized in the permit terms and conditions library accessible at <http://www.epa.ohio.gov/> for emissions unit subject to OAC rule 3745-17-11(C)(1),(C)(2) and are based on the work practice requirements



of OAC rule 3745-17-11(C)(2)(a) through (g). Therefore, no changes made to the TV permit.

**20. Topic: K401 and K402 – Offline Repair**

a. Comment:

These units are identified as having Spovens associated with them, however, these systems do not rely on ovens (that would be part of a Spoven) and therefore, the requirements related to natural gas combustion, should be eliminated. In addition, similar to the clean shop repair operations, there is no stack associated with off-line repair.

Response:

K401 was invalidated based on your request to remove the source from the permit. Facility stated emission unit never installed.

In response to your written request of September 28, 2007, we have modified the permit for K402 and K403 to be appropriate for electrically operated infrared ovens.

A0038087 indicates that this emissions unit is controlled by a dry fabric filtration system. OAC rule 3745-17-01(B)(22) gives the following definition: "Stack" means any chimney, flue, conduit or duct, including the outlet of any air pollution control equipment, which is arranged to conduct emissions to the ambient air." The outlet of the filtration system is considered a stack. Engineering Guide 75 further clarifies that "by definition any discharge from control equipment is deemed to be from a stack or stacks. This includes any control equipment that is vented inside a building having non-stack openings."

**21. Topic: P402 – Miscellaneous Solvents**

a. Comment:

For Emission Unit P402-Miscellaneous Solvents, there appears to be a MACT emissions limit included in the "Applicable Emission Limitations and or Control Requirements" that applies to the coating operations (i.e., 0.60 lbs HAPS/GACS) that should not be included for this emissions unit. Please remove the reference to this emission limit.

Response:

P402 was intended to include building-wide booth and equipment cleaning materials. 40 Part 63.3082 indicates that the MACT applicability includes "cleaning materials". Therefore, Subpart IIII is applicable to this emissions unit. However the calculations demonstrating compliance with the emissions limitations as they appear in 63.3161 do not include losses attributed to cleaning materials. Cleaning materials are instead subject to the work practice standards of 40 CFR 63.3094. The MACT reference has been modified to reflect the appropriate citation.

**22. Topic: B402**

a. Comment:

In the proposed revisions of the Title V ROP, for emission unit B402, we note that the emission limits included in section b) *Applicable Emission Limitations and/or Control Requirements* are not consistent with those identified in sect 2, *Additional Terms and Conditions* item e). For example, the CO emission limit referenced in section b) is 10.93 tons per year while the limit in



section 2, e) is 11.56 tons per year. As we discussed, it appears there is a missing sentence indicating that the 11.56 ton per year limit is applicable to more than just B402. Chrysler requests that TDES make the appropriate correction to it 2, e).

Response:

The limits referenced in b)(2)e. are synthetic minor limits under the authority of OAC rule 3745-31-05(D) which originally encompassed the combined emissions of B401 – B403 and K402 – K405. Since B402 was the only emission unit of this group that was installed, the synthetic minor limit now only applies to B402. The term in b)(2)d. explains this situation and states that as long as compliance is demonstrated with the annual natural gas usage restriction for the fuel utilized in B402, compliance shall also be demonstrated with these emission limitations.

**23. Topic: G401 Gasoline Dispensing**

a. Comment:

Including in this draft ROP are requirements to the use of On-Board Refueling and Vapor Recovery (ORVR) for gasoline fill in the Final Assembly building. In the most recent version of the ROP for TNAP, ORVR was noted to have a control efficiency of ninety five percent((5%), however in the draft version of the Title V ROP proved by Mr. Kossow, that value is now stated at ninety six percent (96%) control efficiency. It appears this may have been a typographical error and Chrysler requests that the most recent draft reflect the previously agreed to ninety five percent (95%).

Response:

The permitted control efficiency of 96% is not a typographical error. This was the efficiency stated in the PTI 04-01359 issued 9/2/04 and also the efficiency proposed by the facility in the PTI application for PTI 04-01359. This control efficiency was the basis of LAER. Therefore, no change was made to the TV permit.

**24. Topic: K022 Powder Anti-chip**

a. Comment:

In the section entitled "Testing Requirements", item m) includes an incorrect PE emission factor. The factor listed is 0.019 pounds PE per MMBtu of heat input. Chrysler believes the correct limit is 0.0019 pounds PE per MMBtu heat input.

Response:

Ohio EPA concurs and the change was made in PTI P0115997 issued 1/2/2014 and the same change made to the TV permit.

**25. Topic: K023 Topcoat – Boiler MACT Subpart DDDDD Reference**

a. Comment:

In the draft ROP, the terms and conditions for K023 reference certain requirements in 40 CFR 63 Subpart DDDDD, specifically the requirement to perform inspections and various other related requirements. The requirements of the boiler MACT may or may not apply to certain equipment at the facility and therefore, the terms and conditions related to boiler MACT



requirements should be prefaced throughout the draft permit with the term "if applicable". Chrysler requests that this language be included in the next draft version of the ROP.

Response:

OEPA agrees with company and have made the requested changes.

**26. Topic: P009 and P010 Solvent and Cleaners**

a. Comment:

As we discussed, the recent regulatory changes to the Ohio Administrative Code regarding photo-chemically reactive materials has eliminated the need to separate the requirements for P009 and P010. Accordingly, these two emission units can now be combined into one emission unit with an allowable VOC emission limit based upon a summation of the current allowable emission limits. P009 is subject to a VOC limit of 52.28 tons per year and P010 is subject to a VOC limit of 5.1 tons per year, both on a twelve month rolling basis. Please combine these two emission units into one with an allowable annual VOC emission limit of 57.38 tons per year.

Response:

Ohio EPA agrees with facility and the changes were made. Also identified a third emission unit (P007) which would also be applicable to combine with P009 and P010 and facility agreed. Administrative modification P0115680 issued 12/30/2013 combined all three emission units under P007 and the changes were made to the TV permit.

**27. Topic: P012 – Finish Welding**

a. Comment:

As we discussed during the meeting, the visible emission observation frequency for this emission unit was changed from monthly to weekly in the most recent draft ROP. Chrysler believes the compliance history of the source warrants that it be reverted back to monthly frequency consistent with the previous issue ROP and the PTI terms and conditions.

Response:

The PTI terms do state a daily observation of opacity to weekly. An administrative PTI modification P0115653 issued 12/17/2013 was done to change the observation frequency to weekly/monthly as requested. The changes were also made to the TV permit.

**28. Topic: B008 through B010**

a. Comment:

In the draft ROP there is an incorrect PM-10 emission factor for these emission units. The incorrect factor is 0.0056 pounds PM-10/MMBtu and should be amended to 0.0075 pounds/MMBtu.

Response:

Ohio EPA agrees with the facility. Administrative modification P0115635 issued 12/17/2013 corrected the emission factor and the same change made to the TV permit.



**29. Topic: F001 and F401**

a. Comment:

The current and draft ROP have two permits for Roadways for the facility. The permits have similar permit conditions. We would like to request that these two sources be combined into one source to simplify the permit. Emission limits would have to be combined. PM10 = 15.4 tons/year and PE = 14 tons/year. An issue to consider is that only F001 has an hourly limit on PM10 (0.32 lb/hr).

Response:

The emission limit for F001 is based on BAT (OAC rule 3745-31-05(A)(3)) while the emission limit for F401 is based on a PSD review (OAC rule 3745-31-10 through 20). These emission limits could not be combined. After explaining this situation, facility agreed there would not be an advantage to combine these two emission units. No further action taken.





## **PRELIMINARY PROPOSED**

### **Division of Air Pollution Control Title V Permit**

for

**Chrysler Group LLC - Toledo North Assembly**

Facility ID:	0448010414
Permit Number:	P0088135
Permit Type:	Renewal
Issued:	2/21/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Chrysler Group LLC - Toledo North Assembly

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**Preliminary Proposed Title V Permit**  
Chrysler Group LLC - Toledo North Assembly  
**Permit Number:** P0088135  
**Facility ID:** 0448010414  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0448010414  
Facility Description: Automotive and Light Duty Truck Assembly Plant.  
Application Number(s): A0019280, A0019281, A0019282, A0019283, A0037324, A0038087, A0046547  
Permit Number: P0088135  
Permit Description: Title V Renewal permit for Automotive and Light Duty Truck Assembly Plant.  
Permit Type: Renewal  
Issue Date: 2/21/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0088134

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Chrysler Group LLC - Toledo North Assembly  
4400 Chrysler Drive  
Toledo, OH 43608-4000

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

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Toledo Department of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Interim Director



**Preliminary Proposed Title V Permit**  
Chrysler Group LLC - Toledo North Assembly  
**Permit Number:** P0088135  
**Facility ID:** 0448010414  
**Effective Date:** To be entered upon final issuance

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



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

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## **2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

- 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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*



c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Toledo Department of Environmental Services. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Toledo Department of Environmental Services by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Toledo Department of Environmental Services unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

### **3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*



#### **4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

#### **5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

#### **6. Severability Clause**

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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

#### **7. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



## **10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## **11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - (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 Toledo Department of Environmental Services 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Toledo Department of Environmental Services) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Toledo Department of Environmental Services with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Toledo Department of Environmental Services as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.



This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## **17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*



**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. Inspections and Information Requests**

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



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Toledo Department of Environmental Services must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

**30. Submitting Documents Required by this Permit**

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 Toledo Department of Environmental Services, 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Preliminary Proposed Title V Permit**  
Chrysler Group LLC - Toledo North Assembly  
**Permit Number:** P0088135  
**Facility ID:** 0448010414  
**Effective Date:** To be entered upon final issuance

## **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.  
  
(Authority for term: OAC Rule 3745-77-07(C)(1))
  
2. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emission units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.
  - a) **None.**  
  
(Authority for term: OAC Rule 3745-77-07(C)(1))
  
3. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
  - a) B003 - Hastings heater #1 (4.5 mmBtu per hour natural gas fired)
  - b) B004 - Hastings heater #2 (4.5 mmBtu per hour natural gas fired)
  - c) B005- Hastings heater #3 (4.5 mmBtu per hour natural gas fired)
  - d) B006 - Hastings heater #4 (4.5 mmBtu per hour natural gas fired)
  - e) B007- Hastings heater #5 (4.5 mmBtu per hour natural gas fired)
  - f) K409 - Windshield Fluid Fill
  - g) T001 - 10,000 gal. windshield washer fluid storage tank
  - h) Z001 - Plant-wide various fluid storage tanks (refrigerant, engine oil, antifreeze, brake, and transmission); Toledo Supplier Park Final Assembly building
  - i) Z003 - Plant-wide misc. fluid fill operations (oil,brake,transmission,antifreeze,power steering,air conditioner,windshield washer); Toledo Supplier Park Final Assembly building
  - j) Z004 - Plant-wide water test booths and car wash booth; Toledo Supplier Park Final Assembly building
  - k) Z006 - Plant-wide heaters 4 mmBtu > 10mmBtu per hour; Toledo Supplier Park Final Assembly building
  - l) Z007 - Plant-wide Safety Kleen part washers and spraygun cleaners
  - m) Z011 - Direct fired gas makeup heaters <10 mmBtu per hour each, totaling 247 mmBtu per hour, TNAP



(Authority for term: OAC Rule 3745-77-07(C)(1))

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart MM: K021, K022 and K023. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.

(Authority for term: 40 CFR Part 60)

5. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 2 of Subpart IIII.

The following emissions units in this permit are subject to the aforementioned requirements: K008, K009, K010, K021, K022, K023, K024, K027, K029, K402, K403, K407, P007, P008, P014, P401 and P402.

(Authority for term: 40 CFR Part 63)

6. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K008, K009, K010, K021, K022, K023, K024, K027, K029, K402, K403, K407, P007, P008, P014, P401 and P402. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.

(Authority for term: 40 CFR Part 63)

7. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

The following emissions units in this permit are subject to the aforementioned requirements: B008, B009, B010, K021, K022, K023 and P008.

(Authority for term: 40 CFR Part 63)

8. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional process heaters located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) process heaters by January 31, 2013, or upon startup, whichever is later; and the facility's existing process heaters shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016.

- a) The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.



(Authority for term: 40 CFR Part 63, Subpart DDDDD)

- b) The following process heater(s) is/are designed to only burn gas 1 fuels (subcategory) and therefore is/are not subject to the emission limits in Tables 1 or 11 through 13 of the subpart or the operating limits in Table 4 to the subpart. However, the process heater(s) is/are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart:

B008, B009, B010, K021, K022, K023 and P008

(Authority for term: 40 CFR 63.7500(e) and 40 CFR 63.7540(a)(10) through (13))

- c) The following process heater(s) is/are identified as limited-use process heater(s) and are not subject to the emission limits in Tables 1, or 11 through 13 of the subpart, the operating limits in Table 4 of the subpart, or the energy assessment requirements in Table 3 of the subpart. However, the limited-use process heater(s) is/are subject to 5-year tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart:

B008, B009, B010, K021, K022, K023 and P008

Each limited-use process heater identified above shall have a federally enforceable average annual capacity factor of no more than 10%.

(Authority for term: 40 CFR 63.7500(c) and 40 CFR 63.7540(a)(10) (12), and (13))

(Authority for term: 40 CFR 63.6(b)(2), 40 CFR 63.7485, 40 CFR 63.7490 and 40 CFR 63.7495)

- 9. The Ohio EPA has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units K021 and K023. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

Pursuant to 40 CFR 64.2(b), CAM will not apply to the MACT emission limitations or standards in 40 CFR Part 63, Subpart DDDDD, after the compliance date in that rule.

(Authority for term: 40 CFR Part 64)

- 10. Recordkeeping for netting purposes as required by P0108007, P0108040 and P0108063 for VOCs.
  - a) The permittee shall monitor the emissions of VOC that are emitted by emissions units P008, P012, P014, K021, K022, and K023 associated with Chrysler Group, LLC's PTI 04-1102 and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the NSR project increases the design capacity or potential to emit of that regulated NSR pollutant at such emissions unit.
  - b) If the unit is an existing unit, the permittee shall submit a report through the Ohio EPA's eBusiness Center: Air Services online web portal if the annual emissions, in tons per year, from



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Chrysler Group, LLC's PTI 04-1102, as modified by P0108007, P0108040 and P0108063, exceed the baseline actual emissions (as documented and maintained pursuant to paragraph (C)(1)(c) of OAC rule 3745-31-10, by a significant amount for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to paragraph (C)(1)(c) of OAC rule 3745-31-10. The permittee's pre-construction projection is listed in Table 1 below where construction is planned to be completed in fall of 2012 in time for start of assembly for Model Year 2013. Such report shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal within 60 days after the end of such year. The report shall contain the following:

- (1) The name, address and telephone number of the major stationary source;
- (2) The annual emissions as calculated pursuant to 5.a) above; and
- (3) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).



**Table 1 NSR for VOC - Baseline Actual Emissions vs. Potential/Projected Actual Emissions**

	Baseline 2002/2003 Actual Emissions (tons/yr)	*Potential Emissions **Projected Actual Emissions (tons/yr)	Incremental Difference (tons/yr)
	VOC	VOC	VOC
<b>New &amp; Modified Sources at PTE*</b>			
P008 new burners	0	0.39	0.39
K021 new burners	0	0.21	0.21
K022 new burners	0	0.15	0.15
K023 new burners	0	0.15	0.15
P012	0	0	0
P014	0	8.67	8.67
Make up air heaters	0	0.86	0.86
Air supply house	0	0.19	0.19
New Emergency Generator (PBR)	0	0.06	0.06
<b>Emissions from Associated Units**</b>	0	10.68	10.68
K021	3.02	3.52	0.50
K022	1.35	1.57	0.22
K023	229.16	266.97	37.81
P007	162.04	188.78	26.74
P008	38.55	73.02	34.47
P009	35.24	41.05	5.81
P010	0.85	0.99	0.14
<b>Subtotals</b>	470.21	586.58	116.37
<b>Excludable Emissions</b>			<77.34>

(Authority for term: OAC Rule 3745-77-07(C)(1))



11. Organic Liquid Distribution (OLD) MACT, 40 CFR Part 63, Subpart EEEE

a) Emission Unit Description

- (1) No affected source at this facility currently has applicable Subpart EEEE requirements.

[Authority for term: Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) Except as provided in 40 CFR 63.2338(c), an OLD MACT affected source is the collection of activities and equipment used to distribute organic liquids into, out of, or within a facility that is a major source of HAP. The affected source is composed of:

- a. All storage tanks storing organic liquids.
- b. All transfer racks at which organic liquids are loaded into or unloaded out of transport vehicles and/or containers.
- c. All equipment leak components in organic liquids service that are associated with:
  - i. Storage tanks storing organic liquids;
  - ii. Transfer racks loading or unloading organic liquids;
  - iii. Pipelines that transfer organic liquids directly between two storage tanks that are subject to this subpart;
  - iv. Pipelines that transfer organic liquids directly between a storage tank subject to this subpart and a transfer rack subject to this subpart; and
  - v. Pipelines that transfer organic liquids directly between two transfer racks that are subject to this subpart.
- d. All transport vehicles while they are loading or unloading organic liquids at transfer racks subject to this subpart.
- e. All containers while they are loading or unloading organic liquids at transfer racks subject to this subpart.

[Authority for term: 40 CFR 63.2338]

b) Additional Requirements

- (1) The permittee must submit a subsequent Compliance Report if any of the following occurs:
- a. The permittee changes the materials in an existing affected storage tank that has a capacity equal to or greater than 5,000 gallons in such a way that the annual average true vapor pressure of the total organic hazardous air pollutant is above 4.0 psia;



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- b. The permittee installs a new affected storage tank with a capacity equal to or greater than 5,000 gallons;
- c. Any transfer rack (except those racks at which only unloading of organic liquids occurs) became part of the affected source; or
- d. There are changes to the information reported pursuant to 63.2386(c)(1), 63.2386(c)(2), or 63.2386(c)(3).

[Authority for term: 40 CFR 63.2343(b)(2)(i), (d)]

- (2) Each subsequent Compliance Report shall be submitted with the next Title V semiannual report.

[Authority for term: 63.2386(e)]

- (3) Unless other arrangements have been approved by the Director, copies of these notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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



**1. B029, ASH F**

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

16.53 mmBtu/hr natural gas, direct-fired air makeup unit, TNAP

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 04-01102 modified 9/8/05)	emissions from each emissions unit shall not exceed:  0.02 pound per mmBtu and 1.45 tons of carbon monoxide (CO) per year; 7.24 tons of nitrogen oxides (NOx) per year; and 0.38 ton of volatile organic compounds (VOC) per year  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-10 thru 20	emissions from each emissions unit shall not exceed:  0.1 pound NOx per mmBtu; and 0.0052 pound VOC per mmBtu  see b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)d.
e.	OAC rule 3745-18-06(A)	see b)(2)e.

(2) Additional Terms and Conditions

a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.



- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 thru 20.
- c. Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average.
- d. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102, issued on September 8, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, issued on September 8, 2005: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60,



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Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

0.02 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

1.45 tons of CO per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.02 pound of CO per mmBtu by the maximum heat input capacity of 16.53 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

d. Emission Limitation:

0.1 pound of NOx per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 100 pounds of NOx emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.



e. Emission Limitation:

7.24tons of NOx per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.1 pound of NOx per mmBtu by the maximum heat input capacity of 16.53 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.0052 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.38 ton of VOC per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0052 pound of VOC per mmBtu by the maximum heat input capacity of 16.53 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, issued on September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)].



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g) Miscellaneous Requirements

(1) None.



**2. B030, ASH G**

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

11.03 mmBtu/hr natural gas, direct-fired air space heater, TNAP

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 04-01102 modified 9/8/05)	emissions from each emissions unit shall not exceed:  0.02 pound per mmBtu and 0.97 ton of carbon monoxide (CO) per year; 4.84 tons of nitrogen oxides (NOx) per year; and 0.26 ton of volatile organic compounds per year  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-10 thru 20	emissions from each emissions unit shall not exceed:  0.1 pound NOx per mmBtu; and 0.0052 pound VOC per mmBtu  see b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)d.
e.	OAC rule 3745-18-06(A)	see b)(2)e.

(2) Additional Terms and Conditions

a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.



- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 thru 20.
- c. Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average.
- d. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)].



d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102, issued on September 8, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, issued on September 8, 2005: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60,



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Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

0.02 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

0.97 ton of CO per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.02 pound of CO per mmBtu by the maximum heat input capacity of 11.03 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

d. Emission Limitation:

0.1 pound of NOx per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 100 pounds of NOx emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.



e. Emission Limitation:

4.84tons of NOx per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.1 pound of NOx per mmBtu by the maximum heat input capacity of 11.03 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.0052 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.26ton of VOC per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0052 pound of VOC per mmBtu by the maximum heat input capacity of 11.03 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, issued on September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)].



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g) Miscellaneous Requirements

(1) None.



**3. B402 - Up to 45 natural gas air supply make up units**

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

Air Make-up Units (less than 10 mmBtu) with a total heat capacity of 95 mmBtu, Supplier Park

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 04-01359 modified 11/29/2007)	the combined emissions from all emissions sources comprising this emissions unit shall not exceed:  0.083 pound of carbon monoxide (CO) per mmBtu; 7.9 pounds of CO per hour; 10.93 tons of CO per year; 8.1 pounds of nitrogen oxides (NOx) per hour; 11.18 tons of NOx per year; 0.19 pound of particulate emissions (PE) per hour; 0.25 ton of PE per year; 0.72 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per hour; 0.99 ton of PM10 per year; 0.0006 pound of sulfur dioxide (SO2) per mmBtu; 0.06 pound of SO2 per hour; 0.08 ton of SO2 per year; 0.52 pound of volatile organic compounds (VOC) per hour; and 0.71 ton of VOC per year  see b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D) (PTI 04-01359 modified 11/29/2007)	see b)(2)d. and b)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-10 thru 20 (PTI 04-01359 modified 11/29/2007)	the combined emissions from all emissions sources comprising this emissions unit shall not exceed:  0.085 pound of NOx per mmBtu; 0.0019 pound of PE per mmBtu; and 0.0075 pound of PM10 per mmBtu  see b)(2)d. and b)(2)f.
d.	OAC rules 3745-31-21 thru 27 (PTI 04-01359 modified 11/29/2007)	the combined emissions from all emissions sources comprising this emissions unit shall not exceed:  0.085 pound of NOx per mmBtu; and 0.0054 pound of VOC per mmBtu.  see b)(2)d. and b)(2)g.
e.	OAC rule 3745-17-07(A)(1)	see b)(2)h.
f.	OAC rule 3745-17-10(B)(1)	see b)(2)i.
g.	OAC rule 3745-18-06(A)	see b)(2)j.

(2) Additional Terms and Conditions

- a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas at a maximum permitted annual fuel usage rate of 258 million standard cubic feet (mmscf). Therefore, provided compliance is demonstrated with the annual natural gas usage restriction, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% percent opacity as a six-minute average.
- c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 through 27.
- d. These emission limitations were established for PTI purposes to reflect the potential to emit for in all fuel burning emissions units located at the final assembly facility, i.e., emissions units B401 through B403 and K402 through K405, at a maximum permitted annual fuel usage rate of 258 million standard cubic feet (mmscf) of natural gas and 250,000 gallons of no. 2 fuel oil. Only the natural gas fired emissions unit B402 was installed and operated in the final assembly facility. Therefore, provided compliance is demonstrated with the annual natural gas usage restriction for the fuel utilized in B402, compliance shall also be demonstrated with these emission limitations.



- e. the combined emissions from all emissions sources comprising this emissions unit shall not exceed:
  - i. 11.56 tons of CO per rolling, 12-month period; and
  - ii. 9.01 tons of SO<sub>2</sub> per rolling 12-month period.
- f. the combined emissions from all emissions sources comprising this emissions unit shall not exceed:
  - i. 12.44 tons of NO<sub>x</sub> per rolling, 12-month period;
  - ii. 0.52 ton of PE per rolling, 12-month period; and
  - iii. 1.41 tons of PM<sub>10</sub> per rolling 12-month period.
- g. the combined emissions from all emissions sources comprising this emissions unit shall not exceed:
  - i. 12.44 tons of NO<sub>x</sub> per rolling, 12-month period; and
  - ii. 0.74 ton of VOC per rolling 12-month period.
- h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- i. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 thru 20.
- j. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 04-01359]

- (2) The maximum annual natural gas usage for B402 shall not exceed 258 million standard cubic feet (mmscf), based upon a rolling, 12-month summation of the natural gas usage for all emissions sources comprising this emissions unit.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

Authority for term: OAC rule 3745-77-07(A)(1) and PTI 04-01359]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (2) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of natural gas (in cubic feet) burned in all emissions sources comprising this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain monthly records of the total quantity of natural gas burned in all emissions sources comprising this emissions unit, in mmscf per month and as a rolling, 12-month summation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01359 as modified November 29, 2007: d)(2) and d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month of the calendar quarter during which the quantity of natural gas burned in all emissions sources comprising this emissions unit exceeded the operational restrictions, and the actual cumulative quantity of fuel burned for each such month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01359 as modified November 29, 2007: e)(1) through e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60,



Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.083 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

7.9 pounds of CO per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.083 pound of CO per mmBtu by the maximum heat input capacity of 95 mmBtu per hour.

d. Emission Limitation:

10.93 tons of CO per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.083 pound of CO per mmBtu by the maximum annual fuel usage (258 mmscf per year) and by 1020 mmBtu per mmscf and divide by 2,000 pounds per ton.

e. Emission Limitation:

0.085 pound of NO<sub>x</sub> per mmBtu.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor



of 50 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

f. Emission Limitation:

8.1 pounds of NO<sub>x</sub> per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.085 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 95 mmBtu per hour.

g. Emission Limitation:

11.18 tons of NO<sub>x</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.085 pound of NO<sub>x</sub> per mmBtu by the maximum annual fuel usage (258 mmscf per year) and by 1020 mmBtu per mmscf and divide by 2,000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.



i. Emission Limitation:

0.19 pound of PE per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0019 pound of PE per mmBtu by the maximum heat input capacity of 95 mmBtu per hour.

j. Emission Limitation:

0.25 ton of PE per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0019 pound of PE per mmBtu by the maximum annual fuel usage (258 mmscf per year) and by 1020 mmBtu per mmscf and divide by 2,000 pounds per ton.

k. Emission Limitation:

0.0075 pound of PM10 per mmBtu

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

l. Emission Limitation:

0.72 pound of PM10 per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0075 pound of PM10 per mmBtu by the maximum heat input capacity of 95 mmBtu per hour.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

m. Emission Limitation:

0.99 ton of PM10 per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0075 pound of PM10 per mmBtu by the maximum annual fuel usage (258 mmscf per year) and by 1020 mmBtu per mmscf and divide by 2,000 pounds per ton.

n. Emission Limitation:

0.0006 pound of SO2 per mmBtu.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO2 emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

o. Emission Limitation:

0.06 pound of SO2 per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0006 pound of SO2 per mmBtu by the maximum heat input capacity of 95 mmBtu per hour.

p. Emission Limitation:

0.08 ton of SO2 per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0006 pound



of SO<sub>2</sub> per mmBtu by the maximum annual fuel usage (258 mmscf per year) and by 1020 mmBtu per mmscf and divide by 2,000 pounds per ton.

q. Emission Limitation:

0.0054 pound of VOC per mmBtu.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

r. Emission Limitation:

0.52 pound of VOC per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0054 pound of VOC per mmBtu by the maximum heat input capacity of 95 mmBtu per hour.

s. Emission Limitation:

0.71 ton of VOC per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0054 pound of VOC per mmBtu by the maximum annual fuel usage (258 mmscf per year) and by 1020 mmBtu per mmscf and divide by 2,000 pounds per ton.

t. Emission Limitation:

The combined emissions from all fuel burning emissions units located at the final assembly facility, i.e., emissions units B401 through B403 and K402 through K405 shall not exceed the following:



- 11.56 tons of CO as a rolling, 12-month summation;
- 12.44 tons of NOx as a rolling, 12-month summation;
- 1.41 tons of PM10 as a rolling, 12-month summation;
- 9.01 tons of SO2 as a rolling, 12 month summation; and
- 0.74 ton of VOC as a rolling, 12-month summation.

**Applicable Compliance Method:**

These emission limitations were established for PTI purposes to reflect the potential to emit for all fuel burning emissions units located at the final assembly facility, i.e., emissions units B401 through B403 and K402 through K405, at a maximum permitted annual fuel usage rate of 258 million standard cubic feet (mmscf) of natural gas and 250,000 gallons of no. 2 fuel oil. Only the natural gas fired emissions unit B402 was installed and operated in the final assembly facility. Therefore, provided compliance is demonstrated with the annual natural gas usage restriction for the fuel utilized in section d)(3), compliance shall also be demonstrated with these emission limitations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01359 as modified November 29, 2007: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

- g) **Miscellaneous Requirements**
  - (1) None.



**4. F001, Plant Roadways and Parking Lots**

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

Roadways and parking areas, TNAP

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 04-01102 modified 9/8/05)	no visible emissions of fugitive dust except for a period of time not to exceed one minute during any 60-minute period  best available control measures that are sufficient to minimize or eliminate visible particulate emissions (PE) of fugitive dust (see b)(2)a. through b)(2)e.)  see b)(2)f.
b.	OAC rule 3745-31-10 through 20 (PTI 04-01102 modified 9/8/05)	emissions of fugitive particulate matter of 10 microns or less in diameter (PM10) shall not exceed 0.32 pound per hour and 1.4 tons per rolling 12-month period
c.	OAC rule 3745-17-07(B)(4)	see b)(2)g.
d.	OAC rule 3745-17-08(B), (B)(7), (B)(8), (B)(9)	see b)(2)a. through b)(2)e. and b)(2)h.

(2) Additional Terms and Conditions

a. All roadways and parking areas shall be paved.

b. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's



application, the permittee has committed to treat the paved roadways and parking areas by flushing with water, sweeping and/or by the application of water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20.
- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
Loop Road, T/CF Avenue 3, Paint Avenue 4, Body Avenue 5, and	Weekly



the Office Road for the original plant

<u>Paved parking areas:</u>	<u>minimum inspection frequency</u>
Truck marshalling Lot A, Truck marshalling Lot B, North Parking Lot, South Parking Lot, West Parking Lot, Visitor Parking Lot Shipping Lot A Shipping Lot B	Weekly

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) After the permittee has performed weekly inspections of the paved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and



- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(4)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102 as modified September 8, 2005: d)(1) through d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, as modified September 8, 2005: e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these



requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

b. Emission Limitations:

emissions of fugitive PM10 shall not exceed 0.32 pound per hour and 1.4 tons per year.

Applicable Compliance Method:

If required, compliance with fugitive PM10 limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP 42, Fifth Edition, Volume 1 (revised 12/03) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used allowing a 95% control efficiency.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, as modified September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

(1) None.



**5. F401, Paved Roads and Parking Areas**

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

Paved roadways and parking areas, Supplier Park

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 04-01359 modified 11/29/07)	fugitive particulate emissions (PE) shall not exceed 14 tons per rolling 12-month period  no visible particulate emissions except for a period of time not to exceed one minute during any 60-minute period  best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust (see b)(2)a. through b)(2)e.)  see b)(2)f.
b.	OAC rule 3745-31-10 through 20 (PTI 04-01359 modified 11/29/07)	emissions of fugitive particulate matter of 10 microns or less in diameter (PM10) shall not exceed 2.8 tons per rolling 12-month period
c.	OAC rule 3745-17-07(B)(4)	see b)(2)g.
d.	OAC rule 3745-17-08(B), (B)(7), (B)(8), (B)(9)	see b)(2)a. through b)(2)e. and b)(2)h.



(2) Additional Terms and Conditions

- a. All roadways and parking areas shall be paved.
- b. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the paved roadways and parking areas by flushing with water, sweeping and/or by the application of water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20.
- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:



paved roadways and parking areas      minimum inspection frequency

all serving the Suppliers Park Complex      weekly

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (2) After the permittee has performed weekly inspections of the paved roadways and parking areas for a calendar quarter and no visible emissions of fugitive dust have been observed, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to weekly until such time as there are no visible particulate emissions for another calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-1359]

- (3) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in (4)d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]



e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation:

No visible PE from paved roadways and parking areas except for a period of time not to exceed one minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

- b. Emission Limitations:

fugitive emissions shall not exceed 14 tons as PE and 2.8 tons as PM10 per year.



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Applicable Compliance Method:

If required, compliance with fugitive particulate limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP 42, Fifth Edition, Volume 1 (revised 12/03) for paved roadways. Should further updates in AP-42 occur, the most current equations for paved roads shall be used allowing a 95% control efficiency.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01359 as modified November 29, 2007: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**6. G003, Gasoline Fill Stations**

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

Gasoline dispensing operations with Stage II vapor control or ORVR control and gasoline AST with Stage I control, TNAP

- 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 04-01102 modified 9/8/05)	see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 through 20 (PTI 04-01102 modified 9/8/05)	34.0 tons per year of volatile organic compounds (VOC) per rolling, 12-month period
c.	OAC rule 3745-21-09(R)	see b)(2)c.

(2) Additional Terms and Conditions

- a. The permittee shall vent all vapors displaced from the transfer of gasoline from the stationary storage tank into the motor vehicle to a vapor control system, or equivalent, which is designed and operated to maintain an overall control efficiency of not less than 90 percent, by weight, for VOC in the displaced vapors.
 

As an equivalent vapor control system, the permittee has committed to the following: the permittee shall equip every vehicle fueled in this emissions unit with an On-Board Refueling Vapor Recovery (ORVR) system with a minimum 90% by weight capture and control efficiency.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(R) and OAC rules 3745-31-10 through 20.
- c. The permittee shall not cause, allow or permit the transfer of gasoline in this emissions unit unless the following Stage I requirements are met:
  - i. any stationary storage tank which stores gasoline at the gasoline dispensing facility is equipped with a submerged fill pipe; and



- ii. for any transfer of gasoline from a delivery vessel to a stationary storage tank located at the gasoline dispensing facility, the vapors displaced from the stationary storage tank are processed by one of the following systems:
  - (a) a vapor balance system which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the delivery vessel and which is equipped with a means to prevent the discharge of displaced vapors from an unconnected vapor line; or
  - (b) a vapor control system which is designed and operated to recover at least 90 percent by weight of the VOC in the displaced vapors.
- c) Operational Restrictions
  - (1) Having elected to utilize an equivalent vapor control system, the permittee has committed to the following: for any vehicle fueled in this emissions unit, an On-Board Refueling Vapor Recovery (ORVR) system shall be used to capture and control gasoline vapors that are emitted during the vehicle fueling process.
  - (2) The permittee shall comply with the following operational restrictions for the Stage I vapor control system:
    - a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.
    - b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
    - c. There shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline.
    - d. The permittee shall repair any leak from the vapor balance or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10. Leaks of gasoline vapors from the vapor balance or control system shall be detected as described in OAC 3745-21-10(K)(5), using a liquid manometer (or equivalent device) to measure pressure during loading of gasoline and a portable hydrocarbon gas analyzer to detect any leaks. The hydrocarbon gas analyzer shall be calibrated with 2.2% propane by volume in air (or equivalent calibration gas) for 100% of the lower explosive limit according to the procedures and frequency specified by the manufacturer.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-09(R) and OAC rule 3745-21-10(K)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when a vehicle without ORVR was fueled at this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (2) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of gasoline used to fuel vehicles in this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications amendments deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (3) The permittee shall maintain monthly records of the quantity of gasoline used to fuel vehicles in this emissions unit and shall calculate and record monthly the total quantity of gasoline used to fuel vehicles in this emissions unit during each rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall calculate and record monthly the total VOC emissions as the quantity of gasoline used to fuel vehicles during each rolling, 12-month period multiplied by 3.1 pounds VOC per 1000 gallons of gasoline.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain records that document any time periods when the Stage I vapor balance system was not in service during the transfer of gasoline into the storage tank(s).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall maintain records of the results of each leak check conducted, for the vapor balance or control system, including, at a minimum, the following information:

- a. the date of each inspection;
- b. the findings of each inspection, which shall indicate the location, nature, and severity of the leak (highest detected reading);
- c. a statement that the leak detection method from paragraph (K) of rule 3745-21-10 of the Administrative Code was used or identification of the approved alternative leak detection method applied;
- d. the corrective action(s) taken to repair each leak and the date of final repair;
- e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of rule 3745-21-10 of the Administrative Code; and



f. the inspector's name and signature.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(A), OAC rule 3745-21-09(R)(3) and OAC rule 3745-21-10(K)]

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102 as modified September 8, 2005: d)(1) through d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates a vehicle without ORVR was fueled at this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the total VOC emissions, in tons per rolling, 12-month period exceeds 34.0 tons. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates the Stage I vapor balance system was not in operation during the transfer of gasoline.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Any leak(s) in the vapor balance system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that is/are not repaired within 15 days after identification, shall be identified in the quarterly deviation report and shall include the date the leak was detected, the highest gas analyzer reading, and the date the leak was repaired.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03 and OAC rule 3745-21-09(R)(3)]

- (5) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]



- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102 as modified September 8, 2005:e)(1) through e)(6). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

a minimum 90% by weight capture and control efficiency.

Applicable Compliance Method:

compliance with the overall control efficiency requirement shall be demonstrated through the certification of the ORVR system in accordance with Title II of the Clean Air Act, Section 202, Paragraph 6.

b. Emission Limitation:

34.0 tons of VOC as a rolling, 12-month summation.

Applicable Compliance Method:

compliance shall be demonstrated by multiplying the rolling, 12-month summation of gasoline throughput by an emission factor of 3.1 pounds of VOC per 1000 gallons of gasoline, and then dividing by 2,000 pounds per ton.

This emission factor is based on the following:

0.3 pound per 1000 gallons for balanced underground submerged filling,

1.0 pound per 1000 gallons for underground storage tank breathing and emptying,

0.7 pound per 1000 gallons for spillage, and



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11.0 pounds per 1000 gallons for uncontrolled vehicle refueling operations which is reduced to 1.10 pounds per 1000 gallons with a 90% effective control.

These emission factors are specified in the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Table 5.2-7 (dated 1/95).

If required, the permittee shall establish a site specific emission factor(s) based on EPA approved test procedures.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102 as modified September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**7. G401, Gasoline Dispensing**

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

Gasoline dispensing facility using on-board refueling vapor recover (ORVR) for control. Located at Toledo Supplier Park Final Assembly (draws from G002 and G003 tanks).

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 04-01359 issued 9/2/04)	see b(2)b.
b.	OAC rules 3745-31-21 through 27 (PTI 04-01359 issued 9/2/04)	3.1 tons of volatile organic compounds (VOC) per rolling, 12-month period  see b)(2)a.
c.	OAC rule 3745-21-09(R)	see b)(2)c.

(2) Additional Terms and Conditions

a. The permittee shall equip every vehicle fueled in this emissions unit with an On-Board Refueling Vapor Recovery (ORVR) system with a minimum 96% by weight capture and control efficiency.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(R) and OAC rules 3745-31-21 through 27.

c. The permittee shall not cause, allow or permit the transfer of gasoline in this emissions unit unless the following Stage I requirements are met:

i. Any stationary storage tank which stores gasoline at the gasoline dispensing facility is equipped with a submerged fill pipe; and

ii. For any transfer of gasoline from a deliver vessel to a stationary storage tank located at the gasoline dispensing facility, the vapors displaced from the stationary storage tank are processed by one of the following systems:



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- (a) a vapor balance system which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the deliver vessel and which is equipped with a means to prevent the discharge of displaced vapors from an unconnected vapor line; or
  - (b) a vapor control system which is designed and operated to recover at least 90 percent by weight of the VOC in the displaced vapors.
- c) Operational Restrictions
  - (1) The permittee shall restrict the throughput of this emissions unit to a maximum 2,500,000 gallons of gasoline per rolling, 12-month period.  
  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 04-01359]
  - (2) For any vehicle fueled in this emissions unit, an On-Board Refueling Vapor Recovery (ORVR) system shall be used to capture and control gasoline vapors that are emitted during the vehicle fueling process.
  - (3) The permittee shall comply with the following operational restrictions for the Stage I vapor control system:
    - a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.
    - b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
    - c. There shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline.
    - d. The permittee shall repair any leak from the vapor balance or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10. Leaks of gasoline vapors from the vapor balance or control system shall be detected as described in OAC 3745-21-10(K)(5), using a liquid manometer (or equivalent device) to measure pressure during loading of gasoline and a portable hydrocarbon gas analyzer to detect any leaks. The hydrocarbon gas analyzer shall be calibrated with 2.2% propane by volume in air (or equivalent calibration gas) for 100% of the lower explosive limit according to the procedures and frequency specified by the manufacturer.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-09(R) and OAC rule 3745-21-10(K)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of gasoline used to fuel vehicles in this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications amendments deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (2) The permittee shall maintain monthly records of the quantity of gasoline used to fuel vehicles in this emissions unit and shall calculate and record monthly the total quantity of gasoline used to fuel vehicles in this emissions unit during each rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (3) The permittee shall maintain records that document any time periods when the Stage I vapor balance system was not in service during the transfer of gasoline into the storage tank(s).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (4) The permittee shall maintain records of the results of each leak check conducted, for the vapor balance or control system, including, at a minimum, the following information:

- a. the date of each inspection;
- b. the findings of each inspection, which shall indicate the location, nature, and severity of the leak (highest detected reading);
- c. a statement that the leak detection method from paragraph (K) of rule 3745-21-10 of the Administrative Code was used or identification of the approved alternative leak detection method applied;
- d. the corrective action(s) taken to repair each leak and the date of final repair;
- e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak equal to or greater than one hundred per cent of the lower explosive limit as propane, as determined under paragraph (K) of rule 3745-21-10 of the Administrative Code; and
- f. the inspector's name and signature.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

- (5) The permittee shall maintain records that document any time periods when a vehicle without ORVR was fueled at this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]



- (6) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01359 as modified November 29, 2007: e)(2) and e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates the Stage I vapor balance system was not in operation during the transfer of gasoline.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Any leak(s) in the vapor balance system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that is/are not repaired within 15 days after identification, shall be identified in the quarterly deviation report and shall include the date the leak was detected, the highest gas analyzer reading, and the date the leak was repaired.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any record that indicates a vehicle without ORVR was fueled at this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the annual gasoline throughput for this emissions unit exceeds the applicable limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to



Install 04-01359 as modified November 29, 2007:e)(1), e)(2) and e)(5). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

a minimum 96% by weight capture and control efficiency.

Applicable Compliance Method:

compliance with the overall control efficiency requirement shall be demonstrated through the certification of the ORVR system in accordance with Title II of the Clean Air Act, Section 202, Paragraph 6.

b. Emission Limitation:

3.1 tons of VOC as a rolling, 12-month summation.

Applicable Compliance Method:

compliance shall be demonstrated by multiplying the rolling, 12-month summation of gasoline throughput by an emission factor of 2.44 pounds of VOC per 1000 gallons of gasoline, and then dividing by 2,000 pounds per ton.

This emission factor is based on the following:

0.3 pound per 1000 gallons for balanced underground submerged filling,

1.0 pound per 1000 gallons for underground storage tank breathing and emptying,

0.7 pound per 1000 gallons for spillage, and

11.0 pounds per 1000 gallons for uncontrolled vehicle refueling operations which is reduced to 0.44 pound per 1000 gallons with a 96% effective control.

These emission factors are specified in the USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 5.2, Table 5.2-7 (dated 1/95).



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If required, the permittee shall establish a site specific emission factor(s) based on EPA approved test procedures.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01359]

g) Miscellaneous Requirements

(1) None.



**8. K021, E-Coat**

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

E-coat with 35.0 mmBtu per hour indirect fired, natural gas drying oven controlled by a regenerative thermal oxidizer (RTO) on the oven exhaust, TNAP

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) g)(1)

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
Electrodeposition (E-Coat) prime coat of automobile bodies with regenerative thermal oxidizer (RTO) on the oven exhaust		
a.	OAC rule 3745-31-05(A)(3) (P0110267 issued 7/25/12)	visible particulate emissions from the RTO stack shall not exceed 5% opacity as a 6-minute average  see b)(2)a.
b.	OAC rules 3745-31-10 through 20 (P0110267 issued 7/25/12)	emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 0.23 pound per gallon of applied coating solids as a monthly volume weighted average  emissions of VOC from this emissions unit shall not exceed 52.01 tons during any rolling, 12-month period  see b)(2)b. and b)(2)c.
c.	OAC rule 3745-21-09(C)(1)(a)(i)	VOC content of the coatings in the E-Coat operations tank shall not exceed 1.2 pounds per gallon of coating, excluding water and exempt solvents.
d.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)d.
e.	40 CFR Part 60, Subpart MM (60.390 through 60.398)	see b)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant prime coat operation subject to the emission limitations/control measures specified in this section.	
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)f.
g.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)g.  [63.3091(a) and (b)]
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring, and recordkeeping provisions of this permit.
<b>35.0 mmBtu per hour indirect fired, natural gas drying oven combustion emissions</b>		
i.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01)  (P0115997 issued 1/2/2014)	the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed:  0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input; 0.30ton of PE per rolling, 12-month period; 0.0075 pound of particulate emissions of 10 microns or less in diameter (PM10) per mmBtu of actual heat input; 1.15tons of PM10 per rolling, 12-month period; 0.0075 pound of particulate emissions of 2.5 microns or less in diameter (PM2.5) per mmBtu of actual heat input;



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.15tons of PM2.5 per rolling, 12-month period; 0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input; 0.10ton of SO2 per rolling, 12-month period; 0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input; 0.83ton of VOC per rolling, 12-month period; and 5% opacity as a 6-minute average  see b)(2)h. and b)(2)i.
j.	ORC 3704.03(T)  (P0115997 issued 1/2/2014)	the emissions from the oven combustion stack(s) shall not exceed:  0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and 0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.  see b)(2)h.
k.	OAC rule 3745-31-05(A)(3)(a)(ii)	see b)(2)j.
l.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average
m.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input
n.	OAC rule 3745-18-06(A)	see b)(2)k.
o.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)l.
p.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is a new process heater in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emission limitations/control	The permittee shall comply with the appropriate work practice standards in Table 3 to Subpart DDDDD of 40 CFR Part 63.  [40 CFR 63.7500]  see b)(2)m. and b)(2)n.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	measures specified in this section.	

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM.
- b. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations.
- c. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
- e. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- f. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10



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lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

- g. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- i. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO<sub>2</sub>), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO<sub>2</sub>, and VOC is less than 10 tons per year.

- j. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State



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Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

- k. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.
- l. For each existing process heater a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:
  - i. a visual inspection of the process heater system;
  - ii. an evaluation of operating characteristics of the process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
  - iii. an inventory of major energy use systems consuming energy from affected process heaters, which are under the control of the process heater operator;
  - iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
  - v. a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
  - vi. a list of cost-effective energy conservation measures that are within the permittee's control;
  - vii. a list of the energy savings potential of the energy conservation measures identified; and
  - viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.
- m. Following the initial compliance date, tune-ups must be conducted for each process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing process heater no later than 1/31/16; unless the process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the process heater.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:



The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart MM, including the following sections:

60.393(b)	Requirement to demonstrate compliance monthly
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3092(a)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from operating limits
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3174	Requirements for a capture system and control device which is not utilized to meet the Subpart IIII emission limitations
If control is required for compliance:	
63.3092(b)	Alternate electrodeposition primer system requirements
63.3093(b)	Requirement for meeting operating limitations specified in Table 1
63.3093(c)	Alternate requirements for operating limitations specified in Table 1
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a) through (c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3100(f)	Startup, shutdown and malfunction plan
63.3163(a) through (j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3173(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]



- (5) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Table 3 to Subpart DDDDD	Work practices
63.7540(a)(10)	Annual tune-up requirement

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) For purposes of compliance with OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-21-10(B)(8), the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the e-coat operation:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$$C_{VOC} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_M$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.



$V_w$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the firebox of the thermal incinerator when the incinerator is in operation. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications, with any modifications deemed necessary by the permittee and approved by the Toledo Division of Environmental Services. The device shall have an accuracy of the greater of 0.75 percent of the temperature being measured expressed in degrees Celsius or 4.0 Fahrenheit degrees. Each temperature measurement device shall be equipped with a recording device so that a permanent record is produced. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) For purposes of compliance with OAC rules 3745-31-10 through 20, the permittee shall collect and record the following information for each month for the coating line and control equipment:
- a. the name and identification number of each coating used;
  - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (mass of VOC per volume of applied coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per volume of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - e. the calculated, controlled VOC emissions, in tons of VOC per month and tons of VOC per rolling, 12-month period. The controlled VOC emissions shall be calculated using the controlled VOC emission rate in d. above, the volume solids content per month from b. above and a factor of 2,000 pounds per ton;



- f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-21-09(B)(3)(j) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart MM, including the following sections:

60.393(c)	Procedures for the monthly compliance demonstration
60.394(a) through (c)	Requirements for incinerator temperature monitoring equipment
60.395(b)	Quarterly/semiannual emissions exceedance recordkeeping requirements
60.395(c)	Thermal incinerator temperature recording requirements

[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
If control is required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(i)	Recordkeeping requirements related to M204 PTE determination
63.3130(k)	Record retention for control device performance testing
63.3130(l)	Recordkeeping requirements related operating limits
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
63.3168(a)	Requirements for operation, and maintenance of CPMS
63.3168(b)	Requirements for control device by-pass monitoring



63.3168(c)	Requirements for thermal oxidizer monitoring
63.3168(g)	Requirements for capture system monitoring
63.3169	Requirements for capture and control device which are not taken into account when demonstrating compliance with the applicable emission limitations

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7515(d)	Each annual tune-up specified 63.7540(a)(10) must be no more than 13 months after the previous tune-up.
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 64 - Compliance Assurance Monitoring, including the following sections:

64.3 Monitoring design criteria	The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
	The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
64.9 Recordkeeping requirements	The permittee shall comply with the applicable recordkeeping requirements specified 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.

[Authority for term: 40 CFR Part 64 and OAC rule 3745-77-07(C)(1)]

- (9) TNAP's approach to CAM involves two different indicators for each of the control devices, as provided in the following table.

	Temperature Monitoring	Burner Inspection/Repair
Indicator	Two thermocouples (1 located at the inlet duct, 1 located inside the combustion chamber) will be used to obtain temperature data on a continuous basis, per the USEPA Technical Guidance Document: Compliance Assurance Monitoring 1998,	The RTO burners will be inspected to ensure that they are in good working order. Approach per the USEPA Technical Guidance Document: Compliance Assurance Monitoring, 1998, 1999 and 2000 updates.



	1999, and 2000 update.	
Indicator Range	The indicator range is established as a decrease in the 3-hour average temperature below the average temperature specified during the most recent emission test that demonstrated the emissions unit was in compliance. Initial testing performed on October 29, 2001 established the current indicator temperature at 1,375 degrees Fahrenheit	If an inspection has been performed in a calendar year, this criterion has been met.
QA/QC Practices	verify the accuracy of, or replace, the thermocouple and the device that translates its signal into a temperature readout on an annual basis	review the log of inspection and repairs annually prior to the facility's compliance certification to ensure that the indicator has been performed.
Monitoring Frequency	Continuous temperature monitoring is sampled at least every 15 minutes.	Annually
Data Collection Procedure	Computerized data acquisition and handling.	Manual, visual inspection of the burners and, if needed, repair of the burners will be conducted.
Averaging Period	The standard is a three-hour average temperature.	N/A

[Authority for term: 40 CFR Part 64 and OAC rule 3745-77-07(C)(1)]

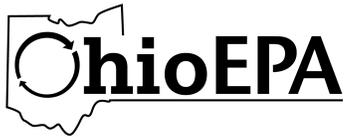
e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) For purposes of compliance with OAC rule 3745-21-09(B)(3)(g), the permittee shall notify the Director of any monthly record showing the use of non-complying coatings. A copy of such record shall be sent to the director within thirty days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(k) and OAC rule 3745-77-07(C)(1)]



- (3) The permittee shall submit quarterly reports to the Director identifying 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 Fahrenheit degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. If no such periods of deviation occur, the permittee shall submit a negative report.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) For purposes of compliance with OAC rules 3745-31-10 through 20, the permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled VOC emission rate exceeds the applicable mass of VOC per volume of applied coating solids limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled rolling 12-month VOC emission rate exceeds the applicable mass emission limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart MM, including the following sections:

60.395(b)	Quarterly/semiannual emissions exceedance reporting requirements
60.395(c)	Thermal incinerator temperature reporting requirements
60.395(d)	M25 30-day notification requirements

[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
If control is required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3120(b)	Performance test report requirements
63.3120(c)	Startup, shutdown and malfunction report content
63.3163(b)	Requirement for deviation reporting for emissions



63.3163(c)	Requirement for deviation reporting for operating parameters
63.3163(d)	Requirement for deviation reporting for control bypass
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation during a period of startup, shutdown, or malfunction

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (10) The permittee shall submit semiannual reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 64 - Compliance Assurance Monitoring, including the following sections:

64.9 Reporting requirements	The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements of d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
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[Authority for term: 40 CFR Part 64 and OAC rule 3745-77-07(C)(1)]

- (11) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average from the RTO stack.

5% opacity as a 6-minute average from each oven combustion stack.

20% opacity as a 6-minute average from each oven combustion stack.



Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

100 percent capture efficiency and a minimum of 95 percent control efficiency for the RTO.

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and the methods and procedures of OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

0.23 pound of VOC per gallon of applied coating solids.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.

e. Emission Limitation:

52.01 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(4)e.



- f. Emission Limitation in accordance with 40 CFR 60 Part, Subpart MM:

0.17 kilogram of VOC per liter of applied coating solids or

0.17×350 (0.160–RT) kg of VOC per liter of applied coating solids.

Applicable Compliance Method:

Compliance shall be demonstrated utilizing the methods and procedures of 40 CFR 60.393(c).

- g. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

- h. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

- i. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



j. Emission Limitation:

0.100 pound of NO<sub>x</sub> per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

k. Emission Limitation:

0.0019 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PM<sub>10</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitations:

0.30 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0019 pound of PE per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.



m. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

n. Emission Limitations:

1.15 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

o. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM2.5 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



p. Emission Limitation:

1.15 tons of PM2.5 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM2.5 per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

q. Emission Limitation:

0.0006 pound of SO<sub>2</sub>/mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO<sub>2</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

r. Emission Limitation:

0.10 ton of SO<sub>2</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO<sub>2</sub> per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

s. Emission Limitation:

0.0054 pound of VOC per mmBtu of actual heat input.

Applicable Compliance Method:



This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pound of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

t. Emission Limitation:

0.83 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. the emission testing shall be conducted within 6 months prior to the permit expiration;
  - b. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services;
  - c. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;
  - d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;



- e. the permittee shall collect and record the 3-hour average combustion temperature within the thermal incinerator during testing; and
- f. the permittee shall collect and record monitoring parameters established to demonstrate that the emissions unit is in compliance with the 100 percent capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements:
  - a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
  - b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
  - c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
  - d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
  - e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be make using a portable CO analyzer);



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- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the annual schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10) through (13), and 40 CFR Part 63, Subpart DDDDD, Table 3]

g) **Miscellaneous Requirements**

- (1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]



**9. K022, Powder Anti-chip**

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

Electrostatic powder anti-chip guidecoat operation with control by particulate filtration for overspray, discharging within the building, and a 41.8 mmBtu per hour natural gas-fired curing oven, TNAP

- 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) g)(1).
- 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
Electrostatic powder anti-chip guidecoat operation		
a.	OAC rule 3745-31-05(A)(3) (P0110267 issued 7/25/12)	the emissions of volatile organic compounds (VOC) from the guidecoat shall not exceed 3.25 tons during any rolling, 12-month period  see b)(2)a.
b.	OAC rules 3745-31-10 through 20 (P0110267 issued 7/25/12)	the requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 60, Subpart MM  see b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)c.
e.	OAC rule 3745-21-09(C)(1)(b)	1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents on a daily basis  see b)(2)d.
f.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)e.
g.	40 CFR Part 60, Subpart MM (60.390 through 60.398)	in accordance with 60.392(b), the emissions of VOC from this emissions



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant guide coat operation subject to the emission limitations/control measures specified in this section.</p>	<p>unit shall not exceed 1.40 kilograms of VOC per liter(11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis</p>
h	<p>40 CFR Part 63, Subpart A (63.1 through 63.16)</p>	<p>see b)(2)f.</p>
i.	<p>40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)</p> <p>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.</p>	<p>see b)(2)g.</p> <p>[63.3091(a) and (b)]</p>
<p align="center"><b>41.8mmBtu per hour natural gas curing oven combustion emissions</b></p>		
j.	<p>OAC rule 3745-31-05(A)(3) (as effective 11/30/01) (P0115997 issued 1/2/2014)</p>	<p>the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed:</p> <p>0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input;          0.35 ton of PE per rolling, 12-month period;          0.0075 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per mmBtu of actual heat input;          1.38 tons of PM10 per rolling, 12-month period;          0.0075 pound of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per mmBtu of actual heat input;          1.38 tons of PM2.5 per rolling, 12-month period;          0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input;          0.11 ton of SO2 per rolling, 12-month period;          0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input;</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.99 ton of VOC per rolling, 12-month period; and 5% opacity as a 6-minute average from each oven combustion stack.  see b)(2)h. and b)(2)i.
k.	ORC 3704.03(T) (P0115997 issued 1/2/2014)	the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed:  0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and 0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.  see b)(2)h.
l.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)j.
l.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from this emissions unit shall not exceed 20 percent opacity as a six-minute average
m.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input
n.	OAC rule 3745-18-06(A)	see b)(2)k.
o.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)l.
p.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is a new process heater in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section.	The permittee shall comply with the applicable work practice standards in Table 3 to Subpart DDDDD of 40 CFR Part 63.  [40 CFR 63.7500]  see b)(2)m. and b)(2)n.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(b) and 40 CFR Part 60, Subpart MM.



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- b. The permittee shall employ only low VOC powder as a coating material in this emissions unit.
- c. The permittee shall employ reasonably available control measures on the powder guidecoat operations associated with this emissions unit for the purpose of ensuring compliance with the applicable requirements. The permittee has committed to utilize inherent fabric filtration and adequate enclosure to minimize or eliminate visible particulate emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. Implementation of these control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B), (B)(3).
- d. The permittee shall utilize only compliant coatings, not exceeding 1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, in this emissions unit.
- e. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- f. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 2 of Subpart IIII.
- g. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

- h. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore,



it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

- i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- j. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO<sub>2</sub>), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO<sub>2</sub>, and VOC is less than 10 tons per year.

- k. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.



- I. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.
  
  - m. For each existing process heater a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:
    - i. a visual inspection of the process heater system;
    - ii. an evaluation of operating characteristics of the process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
    - iii. an inventory of major energy use systems consuming energy from affected process heaters, which are under the control of the process heater operator;
    - iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
    - v. a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
    - vi. a list of cost-effective energy conservation measures that are within the permittee's control;
    - vii. a list of the energy savings potential of the energy conservation measures identified; and
    - viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.
  
  - n. Following the initial compliance date, tune-ups must be conducted for each process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing process heater no later than 1/31/16; unless the process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the process heater.
- c) Operational Restrictions
- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.



[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart MM, including the following sections:

60.393(b)	Requirement to demonstrate compliance monthly
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3092(a)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from operating limits
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3174	Requirements for a capture system and control device which is not utilized to meet the Subpart IIII emission limitations
If control is required for compliance:	
63.3092(b)	Alternate electrodeposition primer system requirements
63.3093(b)	Requirement for meeting operating limitations specified in Table 1
63.3093(c)	Alternate requirements for operating limitations specified in Table 1
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a) through (c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3100(f)	Startup, shutdown and malfunction plan
63.3163(a) through (j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3173(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

- (5) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:



Table 3 to Subpart DDDDD	Work practices
63.7540(a)(10)	Annual tune-up requirement

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee, having chosen to demonstrate compliance through the use of compliant coatings (i.e., only low VOC powder coatings shall be utilized as a coating material and each powder shall comply with the applicable emission limitation as applied), shall collect and record the following information for each month for the coating line:

- a. the name and identification number of each coating, as applied;
- b. the mass of VOC emitted per volume of coating solids of each coating, as applied.
- c. the applied volume of coating solids of each coating;
- d. the monthly emissions of VOC (the summation of b. x c. for all coatings) and the rolling, 12-month summation of the monthly emissions, in tons per year.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart MM, including the following sections:

60.393(c)	Procedures for the monthly compliance demonstration
60.395(b)	Quarterly/semiannual emissions exceedance recordkeeping requirements

[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials



63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
If control is required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(i)	Recordkeeping requirements related to M204 PTE determination
63.3130(k)	Record retention for control device performance testing
63.3130(l)	Recordkeeping requirements related operating limits
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
63.3168(a)	Requirements for operation, and maintenance of CPMS
63.3168(b)	Requirements for control device by-pass monitoring
63.3168(c)	Requirements for thermal oxidizer monitoring
63.3168(g)	Requirements for capture system monitoring
63.3169	Requirements for capture and control device which are not taken into account when demonstrating compliance with the applicable emission limitations

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7515(d)	Each annual tune-up specified 63.7540(a)(10) must be no more than 13 months after the previous tune-up.
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director of any daily record showing that the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within thirty days following the end of the calendar month.



[Authority for term: OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart MM, including the following sections:

60.395(b)	Quarterly/semiannual emissions exceedance reporting requirements
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
If control is required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3120(b)	Performance test report requirements
63.3120(c)	Startup, shutdown and malfunction report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(c)	Requirement for deviation reporting for operating parameters
63.3163(d)	Requirement for deviation reporting for control bypass
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation during a period of startup, shutdown, or malfunction

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]



- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average from each oven combustion stack, and  
20% opacity as a 6-minute average from each oven combustion stack.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.



- d. Emission Limitation:  
  
3.25 tons of VOC per rolling, 12-month period.  
  
Applicable Compliance Method:  
  
Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(2)d.
- e. Emission Limitation:  
  
1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.  
  
Applicable Compliance Method:  
  
Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(2)b. using the procedures in OAC rule 3745-21-09(B)(3)(f) for determining the monthly volume-weighted average mass of VOC emitted per volume of coatings.
- f. Emission Limitation in accordance with 40 CFR Part 60, Subpart MM:  
  
1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis.  
  
Applicable Compliance Method:  
  
The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.
- g. Emission Limitation:  
  
combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.  
  
Applicable Compliance Method:  
  
Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.
- h. Emission Limitation:  
  
combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.



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Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

i. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

j. Emission Limitation:

0.100 pound of NOx per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NOx per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

k. Emission Limitation:

0.0019 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This emissions limitation is less than the result of calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.



If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

I. Emission Limitations:

0.35 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0019 pound PE per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

m. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

n. Emission Limitation:

1.38 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.



o. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM2.5 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

p. Emission Limitation:

1.38 tons of PM2.5 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM2.5 per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

q. Emission Limitation:

0.0006 pound of SO<sub>2</sub>/mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO<sub>2</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



r. Emission Limitations:

0.11 ton of SO<sub>2</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO<sub>2</sub> per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

s. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pound of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

t. Emission Limitation:

0.99 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements:

- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);



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- b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
- c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
- d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
- e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the annual schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10) through (13), and 40 CFR Part 63, Subpart DDDDD, Table 3]

g) Miscellaneous Requirements

- (1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]



**10. K023, Topcoat**

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

Topcoat with 2 natural gas infrared flash tunnels and 2 indirect fired drying ovens with a combined installed heat input capacity of 50.4 mmBtu per hour, TNAP

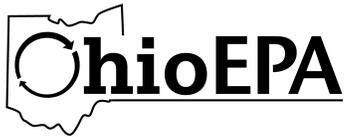
a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

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
	two automotive topcoat booths with waterwash filtration, using waterborne basecoat and solvent-borne clearcoat, with control by regenerative thermal oxidizer (RTO) on the two clearcoat drying ovens	
a.	OAC rule 3745-31-05(A)(3) (P0110267 issued 7/25/12)	the emissions from this emissions unit this emissions unit shall not exceed 68.46 tons of particulate matter equal to 10 microns or less in diameter (PM10) as a rolling, 12-month summation  visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a 6-minute average  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (P0110267 issued 7/25/12)	the particulate emissions (as PM10) from this emissions unit shall not exceed 15.63 pounds of PM10 per hour
c.	OAC rules 3745-31-10 through 20 (P0110267 issued 7/25/12)	8.63pounds of volatile organic compounds (VOC) per gallon of applied coating solids on a monthly basis, and 768.68 tons of VOC as a rolling, 12-month summation  see b)(2)b. through b)(2)d.
d.	OAC rule 3745-17-07(A)(1)	see b)(2)e.
e.	OAC rule 3745-17-11(C)(3)	exemption from work practice



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements
f.	OAC rule 3745-21-09(C)(1)(c)	combined emissions from the paint booth emissions of VOC from this emissions unit shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids on a daily basis
g.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)f.
h.	40 CFR Part 60, Subpart MM (60.390 through 60.398)  In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant topcoat coat operation subject to the emission limitations/control measures specified in this section.	see b)(2)g.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)h.
j.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)i.  [63.3091(a)]
k.	40 CFR Part 64 (64.1 through 64.10)  This unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring, and recordkeeping provisions of this permit.
two natural gas infrared flash tunnels and two indirect fired, drying ovens with a combined heat input capacity of 50.4 mmBtu per hour; combustion emissions		
l.	OAC rule 3745-31-05(A)(3)	the combined emissions from the oven



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(as effective 11/30/01) (P0110267 issued 7/25/12)	combustion stacks serving this emissions unit shall not exceed:  0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input; 0.42 ton of PE per rolling, 12-month period; 0.0075 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per mmBtu of actual heat input; 1.66 tons of PM10 per rolling, 12-month period; 0.0075 pound of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per mmBtu of actual heat input; 1.66 tons of PM2.5 per rolling, 12-month period; 0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input; 0.14 ton of SO2 per rolling, 12-month period; 0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input; 1.20 tons of VOC per rolling, 12-month period; and 5% opacity as a 6-minute average from each oven combustion stack.  see b)(2)j. and b)(2)k.
m.	ORC 3704.03(T) (P0110267 issued 7/25/12)	the combined emissions from the combustion stacks serving this emissions unit shall not exceed:  0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and 0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.  see b)(2)j.
n.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)l.
o.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from this emissions unit shall not exceed 20 percent opacity as a six-minute average
p.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the oven



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input
q.	OAC rule 3745-18-06(A)	see b(2)m.
r.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)n.
s.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is a new process heater in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section.	The permittee shall comply with the applicable work practice standards in Table 3 to Subpart DDDDD of 40 CFR Part 63.  [40 CFR 63.7500]  see b)(2)o. and b)(2)p.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20.
- b. The permittee shall control the particulate emissions (as PM10) from the coating operations of this emissions unit with a waterwash particulate filter, or equivalent.
- c. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations.
- d. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- f. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
- h. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- i. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

- j. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- k. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.



- I. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO2), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

- m. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

- n. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.
- o. For each existing process heater a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:
  - i. a visual inspection of the process heater system;
  - ii. an evaluation of operating characteristics of the process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
  - iii. an inventory of major energy use systems consuming energy from affected process heaters, which are under the control of the process heater operator;



- iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
  - v. a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
  - vi. a list of cost-effective energy conservation measures that are within the permittee's control;
  - vii. a list of the energy savings potential of the energy conservation measures identified; and
  - viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.
- p. Following the initial compliance date, tune-ups must be conducted for each process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing process heater no later than 1/31/16; unless the process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the process heater.
- c) Operational Restrictions
- (1) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation.  
  
[Authority for term: OAC rule 3745-77-07(A)(1)]
  - (2) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:  
  
The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.  
  
[Authority for term: OAC rule 3745-77-07(A)(1)]
  - (3) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:  
  
The permittee shall burn only natural gas in this emissions unit.  
  
[Authority for term: OAC rule 3745-77-07(A)(1)]
  - (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart MM, including the following sections:



60.393(b)	Requirement to demonstrate compliance monthly
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3092(a)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from operating limits
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3174	Requirements for a capture system and control device which is not utilized to meet the Subpart IIII emission limitations
If control is required for compliance:	
63.3092(b)	Alternate electrodeposition primer system requirements
63.3093(b)	Requirement for meeting operating limitations specified in Table 1
63.3093(c)	Alternate requirements for operating limitations specified in Table 1
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a) through (c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3100(f)	Startup, shutdown and malfunction plan
63.3163(a) through (j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3173(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

- (6) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Table 3 to Subpart DDDDD	Work practices
63.7540(a)(10)	Annual tune-up requirement

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain records that document any time periods when the waterwash system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Pursuant to OAC 3745-21-09(C)(4), the permittee shall maintain daily records for the topcoat process that will enable the permittee to calculate the VOC emission rate in order to demonstrate compliance with the emissions limitation identified in OAC rule 3745-21-09(C)(1)(c) for the topcoat process in accordance with the USEPA's Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Truck Topcoat Operations (EPA-45-/3-88-028, Dec. 1988) and any subsequent revisions thereof. The permittee shall calculate and record the VOC emission rates for the topcoat operation in pounds of VOC per gallon of coating, excluding water and exempt solvents, or in pounds of VOC per gallon of deposited solids on a daily basis, using the overall capture and control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emission unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the firebox of the thermal incinerator when the incinerator is in operation. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications, with any modifications deemed



necessary by the permittee and approved by the Toledo Division of Environmental Services. The device shall have an accuracy of the greater of 0.75 percent of the temperature being measured expressed in degrees Celsius or 4.0 Fahrenheit degrees. Each temperature measurement device shall be equipped with a recording device so that a permanent record is produced. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall collect and record the following information for each month for the coating line and control equipment to demonstrate compliance with the VOC limitations of OAC rule 3745-31-10 through 20:
- a. the name and identification number of each coating, as applied;
  - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the monthly volume-weighted average VOC content (in mass of VOC per volume of applied coating solids) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in mass of VOC per volume of applied coating solids. The controlled VOC emission rate shall be calculated using the daily volume-weighted VOC content and 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;
  - e. the calculated, controlled VOC emissions, in tons of VOC per month and tons of VOC per rolling, 12-month period.
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was greater than 50 Fahrenheit degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

For purposes of compliance with the requirements of OAC rule 3745-31-10 through 20, alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart MM, including the following sections:

60.393(c)	Procedures for the monthly compliance demonstration
60.394(a) through (c)	Requirements for incinerator temperature monitoring equipment
60.395(b)	Quarterly/semiannual emissions exceedance recordkeeping requirements
60.395(c)	Thermal incinerator temperature recording requirements

[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
If control is required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(i)	Recordkeeping requirements related to M204 PTE determination
63.3130(k)	Record retention for control device performance testing
63.3130(l)	Recordkeeping requirements related operating limits
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
63.3168(a)	Requirements for operation, and maintenance of CPMS
63.3168(b)	Requirements for control device by-pass monitoring
63.3168(c)	Requirements for thermal oxidizer monitoring
63.3168(g)	Requirements for capture system monitoring
63.3169	Requirements for capture and control device which are not taken into account when demonstrating compliance with the applicable emission limitations

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]



- (9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7515(d)	Each annual tune-up specified 63.7540(a)(10) must be no more than 13 months after the previous tune-up.
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 64 - Compliance Assurance Monitoring, including the following sections:

64.3 Monitoring design criteria	The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
	The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.
64.9 Recordkeeping requirements	The permittee shall comply with the applicable recordkeeping requirements specified 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.

(Authority for term: 40 CFR Part 64 and OAC rule 3745-77-07(C)(1))

- (11) The company provided approach to CAM involves two different indicators for each of the control devices, as provided in the following table.

	Temperature Monitoring	Burner Inspection/Repair
Indicator	Two thermocouples (1 located at the inlet duct, 1 located inside the combustion chamber) will be used to obtain temperature data on a continuous basis, per the USEPA Technical Guidance Document: Compliance Assurance Monitoring 1998, 1999, and 2000 update.	The RTO burners will be inspected to ensure that they are in good working order. Approach per the USEPA Technical Guidance Document: Compliance Assurance Monitoring, 1998, 1999 and 2000 updates.
Indicator Range	The indicator range is established as a decrease	If an inspection has been performed in a calendar



	in the 3-hour average temperature below the average temperature specified during the most recent emission test that demonstrated the emissions unit was in compliance. Initial testing performed on October 29, 2001 established the current indicator temperature at 1,375 degrees Fahrenheit.	year, this criterion has been met.
QA/QC Practices	verify the accuracy of, or replace, the thermocouple and the device that translates its signal into a temperature readout on an annual basis	review the log of inspection and repairs annually prior to the facility's compliance certification to ensure that the indicator has been performed.
Monitoring frequency	Continuous temperature monitoring is sampled at least every 15 minutes.	Annually
Data Collection Procedure	Computerized data acquisition and handling.	Manual, visual inspection of the burners and, if needed, repair of the burners will be conducted.
Averaging Period	The standard is a three-hour average temperature.	N/A

(Authority for term: 40 CFR Part 64 and OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the water wash system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit semiannual written reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.



These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall notify the Director of any daily record indicating that the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating, excluding water and exempt solvents, or pounds of VOC per gallon of deposited solids on a daily basis exceeded the emissions limitation specified in OAC rule 3745-21-09(C)(1)(c). The notification shall include a copy of such record and shall be sent to the Director within thirty days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(C)(4) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was greater than 50 Fahrenheit degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. If no such periods of deviation occur, the permittee shall submit a negative report.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the monthly pounds of VOC per gallon of applied coating solids exceeds the applicable limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart MM, including the following sections:

60.395(b)	Quarterly/semiannual emissions exceedance reporting requirements
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60.395(c)	Thermal incinerator temperature reporting requirements
60.395(d)	M25 30-day notification requirements

[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (10) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
If control is required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3120(b)	Performance test report requirements
63.3120(c)	Startup, shutdown and malfunction report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(c)	Requirement for deviation reporting for operating parameters
63.3163(d)	Requirement for deviation reporting for control bypass
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation during a period of startup, shutdown, or malfunction

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (11) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (12) The permittee shall submit semiannual reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 64 - Compliance Assurance Monitoring, including the following sections:

64.9 Reporting requirements	The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements of d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.
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[Authority for term: 40 CFR Part 64 and OAC rule 3745-77-07(C)(1)]



- (13) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average.

20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

15.63 pounds of PM10 per hour from the paint booth and curing oven (RTO) stacks.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:



68.46 tons of PM10 as a rolling, 12-month summation.

**Applicable Compliance Method:**

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the short term emission limitation (15.63 pounds of PM10 per hour), by the maximum annual hours of operation (8,760 hours) and then divide by 2,000 pounds per ton.

e. **Emission Limitation:**

emissions of VOC from this emissions unit shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids on a daily basis.

**Applicable Compliance Method:**

Compliance shall be demonstrated pursuant to the methods and procedures set forth in the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", EPA-450-3-88-018, dated December 1988, and any subsequent revision approved by the USEPA and the State of Ohio Environmental Protection Agency, as provided in OAC rule 3745-21-09(C)(4).

f. **Emission Limitation** in accordance with 40 CFR Part 60, Subpart MM:

1.47 kilograms of VOC per liter (12.3 pounds of VOC per gallon) of applied coating solids on a monthly basis.

**Applicable Compliance Method:**

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.

g. **Emission Limitation:**

8.63 pounds of VOC per gallon of applied coating solids on a monthly basis.

**Applicable Compliance Method:**

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



h. Emission Limitation:

768.68 tons of volatile organic compounds (VOC) as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the record keeping requirements of d)(5)e.

i. Emission Limitation:

100 percent capture efficiency and a minimum of 95 percent control efficiency from the RTO.

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and the methods and procedures of OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

j. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

k. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

l. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.



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Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

m. Emission Limitation:

0.100 pound of NO<sub>x</sub> per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

n. Emission Limitation:

0.0019 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This emissions limitation is less than the result of calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

o. Emission Limitation:

0.42 ton of PE per rolling, 12-month period.



Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0019 pound of PE per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

p. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

q. Emission Limitation:

1.66 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

r. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM2.5 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.



If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

s. Emission Limitation:

1.66 tons of PM2.5 per rolling, 12-month period..

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM2.5 per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

t. Emission Limitation:

0.0006 pound of SO<sub>2</sub>/mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO<sub>2</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

u. Emission Limitations:

0.14 ton of SO<sub>2</sub>per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO<sub>2</sub> per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.



v. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pound of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

w. Emission Limitation:

1.20 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. the emission testing shall be conducted within 6 months prior to permit expiration;
- b. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services;
- c. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;



- d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;
- e. the permittee shall collect and record the 3-hour average combustion temperature within the thermal incinerator during testing; and
- f. the permittee shall collect and record monitoring parameters established to demonstrate that the emissions unit is in compliance with the 100 percent capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements:
  - a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
  - b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
  - c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;



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- d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
- e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the annual schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10) through (13), and 40 CFR Part 63, Subpart DDDDD, Table 3]

g) Miscellaneous Requirements

- (1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]



**11. K024, Low bake repair with Spovens**

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

Off-line low bake repair: 8 clean shop stations and two spovens (combination spray booth and electric oven) with a dry particulate filter control system, Spoven 1 and 2 at TNAP

- 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) g)(1).
- 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.

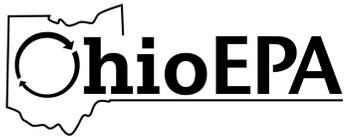
	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01102 modified 9/8/05)	<p>particulate emissions equal to 10 microns or less in diameter (PM10) from this emissions unit shall not exceed 2.4 tons as a rolling, 12-month summation</p> <p>the emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 28 tons as a rolling, 12-month summation</p> <p>visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a 6-minute average</p> <p>see b)(2)a.</p>
b.	OAC rules 3745-31-10 through 20 (PTI 04-01102 modified 9/8/05)	<p>the combined emissions of PM10 from the stacks serving this emissions unit shall not exceed 0.551 pound of per hour</p> <p>see b)(2)b.</p>
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average
e.	OAC rules 3745-17-08(B), (B)(3)	see b)(2)d.
f.	OAC rule 3745-17-11(B)(1)	particulate emissions (PE) from each



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		stack shall not exceed 0.551 pound of per hour
g.	OAC rule 3745-17-11(C)(3)	exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2)
h.	OAC rule 3745-21-09(C)(1)(d)	the emissions of VOC from uncontrolled final repair coating lines shall not exceed 4.8 pounds per gallon of coating, excluding water and exempt solvents.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)e.
j.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)f.  [63.3091(a)]

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d) and OAC rules 3745-31-10 through 20.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan. Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, then these emissions limitations/control measures no longer apply; b)(1)f. and f)(1)c.
- e. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.



f. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

c) **Operational Restrictions**

(1) The permittee shall operate the dry filtration system(s) whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

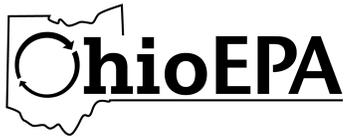
(2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3092(a),(b)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from requirements for operating limitations
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall maintain daily records that document any time periods when a dry filtration system was not in service when the associated emissions source was in operation.



[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When using complying coatings (i.e., each coating contains a maximum of 4.8 pounds VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record the following information each month for this emissions unit;
- a. the name and identification number of each coating, as applied, and
  - b. VOC content (excluding water and exempt solvents) of each coating, as applied,

[Authority for term: OAC rule 3745-17-11(B)(2)(f) and OAC rule 3745-17-11(C)(1)]

- (3) When calculating a daily volume weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit;
- a. the name and identification number of each coating, as applied,
  - b. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - c. the volume weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping.

[Authority for term: OAC rule 3745-17-11(C)(1) and OAC rule 3745-17-11(B)(2)(h)]

- (4) The permittee shall collect and record the following information each month for the purpose of determining the annual VOC emissions:
- a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - d. the total number of gallons (excluding water and exempt solvents) of all coatings employed, calculated as a summation of the quantities recorded in (c) above;
  - e. the total VOC emissions from all coatings employed, in tons per month; and
  - f. the rolling 12-month summation of VOC emissions from all coatings employed, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Requirements for record retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102 as modified September 8, 2005: d)(1) through d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that a dry filtration system was not in service when the associated emissions source(s) was/were in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When demonstrating compliance through the use of complying coatings, the permittee shall notify the Director of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (3) When demonstrating compliance through a daily volume weighted average VOC content, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.



[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(c)(1)	Requirements for continuous compliance demonstration
63.3163(d)	Requirements for control bypass deviations
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102 as modified September 8, 2005:e)(1) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



b. Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.551 pound PE per hour.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (as PE in pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods 1 through 5 of 40 CFR Part 40, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

0.551 pound of PM10 per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix



M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

2.4 tons of PM<sub>10</sub> as a rolling, 12-month summation

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission limitation (0.551 pound of PM<sub>10</sub> per hour), by the maximum annual hours of operation (8,760 hours) and then divide by 2,000 pounds per ton.

f. Emission Limitation:

4.8 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of OAC rule 3745-21-09(B)(3); utilizing the methods and procedures of OAC rule 3745-21-10(B). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

28 tons of volatile organic compounds (VOC) as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the record keeping requirements of d)(5)f.

h. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

i. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102 as modified September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01102]



**12. K027, Blackout**

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

Automotive blackout spray painting, air dried with dry fabric filter, TNAP

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) g)(1)

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 04-01102 modified 9/8/05)	<p>particulate emissions equal to 10 microns or less in diameter (PM10) from this emissions unit shall not exceed 2.8 tons as a rolling, 12-month summation</p> <p>the emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 54 tons as a rolling, 12-month summation</p> <p>visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a 6-minute average</p> <p>see b)(2)a.</p>
b.	OAC rules 3745-31-10 through 20 (PTI 04-01102 modified 9/8/05)	<p>the emissions of PM10 from the stack serving this emissions unit shall not exceed 0.63 pound of per hour</p> <p>the discharge of VOC into the ambient air from this emissions unit shall not exceed 2.0 pounds per gallon of coating, excluding water and exempt solvents</p>
c.	OAC rule 3745-17-07(A)(1)	see b)(2)b.
d.	OAC rule 3745-17-11(B)(1)	particulate emissions (PE) from each spray painting operation shall not exceed 0.63 pound per hour



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(C)(3)	Exemption from OAC rule 3745-17-11(C)(1), (C)(2) see b)(2)c.
f.	OAC rule 3745-21-09(U)(1)(i)	see b)(2)b.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)d.
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)e.  [63.3091(a)]

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20 and OAC rule 3745-21-09(C)(1)(d).
- b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan. Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, then these emissions limitations/control measures no longer apply; b)(1)d. and f)(1)b.
- d. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- e. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram



per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3092(a),(b)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from requirements for operating limitations
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

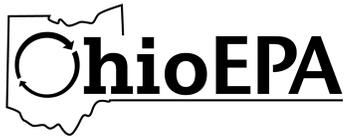
d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When using complying coatings (i.e., each coating contains a maximum of 2.0 pounds VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record the following information each month for this emissions unit;

- a. the name and identification number of each coating, as applied, and



- b. VOC content (excluding water and exempt solvents) of each coating, as applied,  
 [Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]
- (3) When calculating a daily volume weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit;
  - a. the name and identification number of each coating, as applied,
  - b. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - c. the volume weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping.

[Authority for term: OAC rule 3745-21-09(B)(3)(h) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall collect and record the following information each month for the purpose of determining the annual VOC emissions:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - d. the total number of gallons (excluding water and exempt solvents) of all coatings employed, calculated as a summation of the quantities recorded in (c) above;
  - e. the total VOC emissions from all coatings employed, in tons per month; and
  - f. the rolling, 12-month summation of VOC emissions from all coatings employed, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency



63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Requirements for record retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102 as modified September 8, 2005: d)(1) through d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When demonstrating compliance through the use of complying coatings, the permittee shall notify the Director of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (3) When demonstrating compliance by a daily volume weighted average VOC content, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(c)(1)	Requirements for continuous compliance demonstration
63.3163(d)	Requirements for control bypass deviations



63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102 as modified September 8, 2005:e)(1) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

- a. Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- b. Emission Limitation:

0.63 pound PE per hour.

Applicable Compliance Method:



To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (as PE in pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods 1 through 5 of 40 CFR Part 40, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.63 pound of PM10 per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

2.8 tons of PM10 as a rolling, 12-month summation

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission limitation (0.63 pound of PM10 per hour), by the maximum annual hours of operation (8,760 hours) and then divide by 2,000 pounds per ton.

e. Emission Limitation:

2.0 pounds per gallon of coating, excluding water and exempt solvents.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of OAC rule 3745-21-09(B)(3); utilizing the methods and procedures of OAC rule 3745-21-10(B). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

54 tons of volatile organic compounds (VOC) as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the record keeping requirements of d)(4)f.

g. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

h. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102 as modified September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-01102]



**13. K029, Interior touch-up**

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

Interior touchup with dry fabric filtration, TNAP

- 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 04-01102 modified 9/8/05)	the emissions from this emissions unit shall not exceed 5.6 tons of volatile organic compounds (VOC) as a rolling, 12-month summation  visible particulate emissions from any stack(s) serving this emissions unit shall not exceed 5% opacity as a 6-minute average  see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 through 20 (PTI 04-01102 modified 9/8/05)	see b)(2)c.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)d.
d.	OAC rule 3745-17-11(B)(1)	particulate emissions (PE) from each spray painting operation shall not exceed 0.551 pound of per hour
e.	OAC rule 3745-17-11(C)(3)	Exemption from OAC rules 3745-21-11(C)(1),(C)(2)  see b)(2)e.
f.	OAC rule 3745-21-09(C)(1)(d)	the discharge of VOC into the ambient air from this emissions unit shall not exceed 4.8 pounds per gallon of coating, excluding water and exempt solvents.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)f.
h.	40 CFR Part 63, Subpart IIII	see b)(2)g.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	[63.3091(a)]

(2) Additional Terms and Conditions

- a. The permittee shall install and use hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent and control the fugitive dust.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d) and OAC rules 3745-31-10 through 20.
- c. The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(C)(1)(d).
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan. Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, then these emissions limitations/control measures no longer apply; b)(1)d. and f)(1)b.
- f. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- g. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;



or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3092(a),(b)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from requirements for operating limitations
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When using complying coatings (i.e., each coating contains a maximum of 4.8 pounds VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record the following information each month for this emissions unit;

- a. the name and identification number of each coating, as applied, and
- b. VOC content (excluding water and exempt solvents) of each coating, as applied,



[Authority for term: OAC rule 3745-17-11(B)(2)(f) and OAC rule 3745-17-11(C)(1)]

- (3) When calculating a daily volume weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit;
  - a. the name and identification number of each coating, as applied,
  - b. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - c. the volume weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping.

[Authority for term: OAC rule 3745-17-11(C)(1) and OAC rule 3745-17-11(B)(2)(h)]

- (4) The permittee shall collect and record the following information each month for the purpose of determining the annual VOC emissions:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - d. the total number of gallons (excluding water and exempt solvents) of all coatings employed, calculated as a summation of the quantities recorded in (c) above;
  - e. the total VOC emissions from all coatings employed, in tons per month; and
  - f. the rolling 12-month summation of VOC emissions from all coatings employed, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(d) through (f)	Recordkeeping requirements specified for cleaning materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency



63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Requirements for record retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102 as modified September 8, 2005: d)(1) through d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When demonstrating compliance through the use of complying coatings, the permittee shall notify the Director of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (3) When demonstrating compliance by a daily volume weighted average VOC content, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements



63.3163(h)	Administrator's determination of violation
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[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102 as modified September 8, 2005:e)(1) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

0.551 pound PE per hour.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:



$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (as PE in pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods 1 through 5 of 40 CFR Part 40, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

4.8 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of OAC rule 3745-21-09(B)(3); utilizing the methods and procedures of OAC rule 3745-21-10(B). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

5.6 tons of volatile organic compounds (VOC) as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the record keeping requirements of d)(4)f.

e. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

f. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102 as modified September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**14. K407, Clean Shop Repair**

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

Automotive clean shop repair with particulate control by dry filtration, Supplier Park

- 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) (P0111000 effective 12/4/2012)	Emissions from the stack(s) associated with this emissions unit shall not exceed: 0.551 pound of particulate emissions (PE) per hour, 1.6 pounds of particulate matter equal to or less than 10 microns in diameter (PM10) per hour, 1.85 tons of PM10 per year, 0.40 pound of volatile organic compounds (VOC) per hour, 5% opacity as a 6-minute average, and see b)(2)a. through b)(2)d.
b.	OAC rules 3745-31-10 through 20 (P0111000 effective 12/4/2012)	Emissions from the stack associated with this emissions unit shall not exceed: 2.4 tons of PE per rolling, 12-month period, and see b)(2)e. through b)(2)f.
c.	OAC rules 3745-31-21 through 27 (P0111000 effective 12/4/2012)	Emissions from the operation of this emissions unit shall not exceed: 0.5 ton of VOC per rolling, 12-month period, and see b)(2)g. and b)(2)h.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)i.
e.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
f.	OAC rule 3745-21-09(C)(1)(d)	See b)(2)j.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	See b)(2)k.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)l.  [63.3091(a) and (b)]

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d), OAC rules 3745-31-10 through 27 and 40 CFR Part 63, Subparts A and IIII.
- b. No visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at a company supplied emissions factor of 0.0048 pound per job and a maximum production capacity of 82 jobs per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- d. The hourly PM10 emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at a company supplied controlled emissions factor of 0.0185 pound per job and a maximum production capacity of 82 jobs per hour. Therefore, provided the fabric filtration system in use, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- e. All of the operations comprising this emissions unit that generate particulate emissions shall be enclosed and all particulate emissions shall be exhausted through a particulate control system providing a minimum 98% overall control efficiency.
- f. The combined emission from the sanding and coating in all repair operations located at the final assembly facility (K402, K403 and K407) shall not exceed 1.85 tons of PM10 per rolling, 12-month period.
- g. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d).



- h. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$0.5 \text{ ton VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

$Q_i$  = usage of coating material  $i$ , gallons

$VOC_i$  = the mass of VOC (emitted) per volume of coating material  $i$ , pounds per gallon.

- i. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- j. Emissions from the operation of this emissions unit shall not exceed 4.8 pounds of VOC per gallon as a daily volume weighted average of coating, excluding water and exempt solvents.
- k. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- l. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.



c) Operational Restrictions

- (1) All of the operations comprising this emissions unit shall be enclosed and all emissions shall be exhausted through a dry filtration system.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall operate the dry filtration system whenever the respective emissions source is in operation

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3092(a),(b)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from requirements for operating limitations
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when the respective emissions source was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee may elect to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) When compliance is being demonstrated through the use of compliance coatings (i.e., each coating utilized shall comply with the applicable limitation of 4.8 pounds of VOC per gallon as applied),the permittee shall collect and record the following information each month for this emissions unit;

- a. the name and identification number of each coating, as applied, and
- b. VOC content of each coating (excluding water and exempt solvents), as applied.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.



[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(A)(1)]

- (4) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall collect and record the following information each day for this emissions unit;
  - a. the name and identification number of each coating, as applied,
  - b. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - c. the daily volume weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping.

[Authority for term: OAC rule 3745-21-09(B)(3)(h) and OAC rule 3745-77-07(C)(1)]

- (5) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record the following information on a monthly basis the following information:
  - a. the company identification for each coating utilized;
  - b. the volume of each coating applied during the month,  $Q_i$ , in gallons;
  - c. the mass of VOC (emitted) per volume of each coating applied during the month,  $VOC_i$ , in pounds per gallon;
  - d. the total VOC emissions from all coatings utilized, in tons;  $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$  pounds/ton), in tons per month;
  - e. the rolling, 12-month summation of VOC emissions, in tons per year.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials



63.3130(d) through (f)	Recordkeeping requirements specified for cleaning materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when the dry filtration system was not in service when the respective emissions source was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) When compliance with the 4.8 pounds of VOC per gallon limitation is being demonstrated through the use of compliance coatings, the permittee shall notify the Director of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Services within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (3) When compliance with the 4.8 pounds of VOC per gallon limitation is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the coating VOC content exceeded the applicable limitation (4.8 pounds of VOC per gallon).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e.,  $(\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 0.5$  ton in any rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]



- (7) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

visible particulate emissions shall not exceed 5% opacity as a 6 minute average from any stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



c. Emission Limitation:

0.551 pound of PE per hour.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) (1-TE) (1-CE)$$

where:

E = particulate emission rate (pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

2.4 tons of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.551 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

98% control of particulate emissions.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).



Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services

f. Emission Limitation:

1.6 pounds of PM10 per hour.

Applicable Compliance Method:

This emissions limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs per hour) and a company supplied emissions factor (0.0185 pound PM10 per job).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

1.85 tons of PM10 per year.

Applicable Compliance Method:

If required, the permittee shall establish site specific emission factors, in grains per standard cubic foot, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and evaluate the site specific volumetric flow in accordance with Methods 1 thru 4 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

The combined emissions of PM10 from K402, K403 and K407 shall not exceed 1.85 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for emissions units K402, K403 and K407, as follows:

$$(1-98\%)[(0.096 \text{ pound PM10/station-hour})(3 \text{ stations})(8760 \text{ hours/year}) + (23,400 \text{ gallons coating})(0.80 \text{ pound of solids/gallon coating})(15.0 \text{ pounds/gallon of coating})(1-0.35 \text{ pounds emitted/pound applied})] \div 2000 \text{ pounds/ton} = 1.85 \text{ tons of PM10 per year}$$

If required, the permittee shall establish site specific emission factors in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and evaluate the site specific volumetric flow in accordance with Methods 1 thru 4 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



i. Emission Limitation:

4.8 pounds of VOC per gallon as a daily volume weighted average of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

j. Emission Limitation:

0.40 pound VOC per hour.

Applicable Compliance Method:

This emission limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.0048 pound VOC/job).

k. Emission Limitation:

0.5 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(5)e. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.



m. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**15. P007, Cleaning Materials**

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

Facility-wide use of cleaning materials, including materials utilized for solvent body wipes, spray both cleaning, purge and other miscellaneous cleaning solvents, TNAP

- 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 P0115680 issued 12/30/2013)	see b)(2)a.
b.	OAC rules 3745-31-10 through 20 (PTI P0115680 issued 12/30/2013)	Emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 571.56 tons as a rolling, 12-month summation.  see b)(2)b.
c.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)c.
d.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	In accordance with 40 CFR 63.3094(b) and (c), the permittee shall develop and implement a work practice plan to minimize organic HAP emissions.  [63.3082(b)]

- (2) Additional Terms and Conditions
  - a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20 and 40 CFR Part 63 Subparts A and IIII.



- b. The maximum cleaning material usage shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$571.56 \text{ tons VOC} \geq \sum_{i=1}^n (Q)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

$Q_i$  = usage of cleaning material  $i$ , gallons

$VOC_i$  = volatile organic compound content of cleaning material  $i$ , pounds per gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- c. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

c) Operational Restrictions

- (1) The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.
- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a), (e), (f) & (j)	Continuous compliance demonstration
63.3163(a) through (c)	Continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For purpose of compliance with the rolling, 12-month VOC emissions limitation for cleaning materials (571.56 tons), the permittee shall collect and record the following information each month for all cleaning operations:
  - a. the company identification for each cleaning material employed;
  - b. the number of gallons of each cleaning material employed,  $Q_i$ ;
  - c. the VOC content of each cleaning material, in pounds per gallon excluding water and exempt solvents,  $VOC_i$ ;
  - d. the total VOC emissions from all cleaning materials utilized, in tons,  $\sum_{i=1}^n (Q)(VOC_i) \div (2000 \text{ pounds/ton})$ ; and



e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115680]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(d) through (f)	Recordkeeping requirements specified for cleaning materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all cleaning materials utilized in this emissions unit exceeded 571.56 tons per rolling, 12-month period.

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

(3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]



f) Testing Requirements

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

a. Emission Limitation

571.56 tons VOC as a rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements of d)(1), and the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular cleaning material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

(1) None.



**16. P008, Sealers and Adhesives**

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

Automotive sealers and adhesives and a 12.0 mmBtu/hr indirect fired natural gas gel oven, with control by appropriate work practices: TNAP.

- 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
sealant and adhesive emissions		
a.	ORC 3704.03(T) (P0110267 issued 7/25/12)	the emissions of volatile organic compounds (VOC) from all sealers and adhesives utilized in this emissions unit shall not exceed 0.5 pound per gallon, excluding water and exempt solvents, on a monthly basis  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (P0110267 issued 7/25/12)	the emissions of VOC from sealants and adhesives shall not exceed 55.06tons per rolling, 12-month period  see b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(d)	the emissions of VOC from any material which is applied to metallic surfaces shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents
d.	OAC rule 3745-21-09(U)(1)(g)	the emissions of VOC from any glass adhesion body primer coating used for the installation of any glass windows shall not exceed 4.9 pounds per gallon of coating, excluding water and exempt solvent
e.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)d.
f.	40 CFR Part 63, Subpart IIII	In accordance with 40 CFR 63.3091(c)



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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	the average organic hazardous air pollutant (HAP) emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.  [40 CFR 63.3091(c)]
<b>12.0 mmBtu per hour indirect fired, natural gas gel oven combustion emissions</b>		
g.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0110267 issued 7/25/12)	emissions from the stack(s) serving this emissions unit shall not exceed:  0.083 pound per mmBtu and 4.37 tons of carbon monoxide (CO) per rolling, 12-month period; 0.100 pound per mmBtu and 5.26 tons of nitrogen oxides (NOx) per rolling, 12-month period; 0.0019 pound per mmBtu and 0.10 ton of particulate emissions (PE) per rolling, 12-month period; 0.0075 pound per mmBtu and 0.40 ton of particulate matter less than or equal to 10 microns in diameter (PM10) per rolling, 12-month period; 0.0075 pound per mmBtu and 0.40 ton of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per rolling, 12-month period; 0.0006 pound per mmBtu and 0.04 ton of sulfur dioxide (SO <sub>2</sub> ) per rolling, 12-month period; 0.0054 pound per mmBtu and 0.29 ton of volatile organic compounds (VOC) per rolling, 12-month period; visible particulate emissions from this emissions unit shall not exceed 5 percent opacity as a six-minute average; and  see b)(2)e. and b)(2)f.
h.	OAC 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110267 issued 7/25/12)	see b)(2)g.
i.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from this



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions unit shall not exceed 20 percent opacity as a six-minute average
j.	OAC rule 3745-17-10(B)(1)	0.020 pound PE per mmBtu actual heat input
k.	OAC rule 3745-18-06(A)	see b)(2)h.
l.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)i.
m.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is a new process heater in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section.	The permittee shall comply with the applicable work practice standards in Table 3 to Subpart DDDDD of 40 CFR Part 63.  See b)(2)j. and b)(2)k.  [40 CFR 63.7500]

(2) Additional Terms and Conditions

- a. The permittee shall employ only dispensers and disposal containers appropriate to minimize exposure times in this emissions unit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-21-09(U)(1)(g).
- c. The maximum sealer and adhesive usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$55.06 \text{ tons VOC} \geq \sum_{i=1}^n (SA_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

SA<sub>i</sub> = usage of sealer and/or adhesive material *i*, gallons

VOC<sub>i</sub> = volatile organic compound content of material *i*, pounds per gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- d. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.



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- e. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants emitted at less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- g. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM<sub>10</sub>), particulate matter less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and volatile organic compound (VOC) emissions from the natural gas gel oven stack of this air contaminant source since the uncontrolled potential to emit for CO, NO<sub>x</sub>, PE, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC is less than 10 tons per year.

- h. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.



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EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

- i. Table 10 to Subpart DDDDD of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- j. For each existing process heater a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:
  - i. a visual inspection of the process heater system;
  - ii. an evaluation of operating characteristics of the process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
  - iii. an inventory of major energy use systems consuming energy from affected process heaters, which are under the control of the process heater operator;
  - iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
  - v. a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
  - vi. a list of cost-effective energy conservation measures that are within the permittee's control;
  - vii. a list of the energy savings potential of the energy conservation measures identified; and
  - viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.
- k. Following the initial compliance date, tune-ups must be conducted for each process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing process heater no later than 1/31/16; unless the process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the process heater.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:



The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3152(a) through (c)	Continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Table 3 to Subpart DDDDD	Work practices
63.7540(a)(10)	Annual tune-up requirement

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) For purposes of compliance with the emissions limitation for material applied to metallic surfaces (3.5 pounds VOC per gallon, excluding water and exempt solvents) the permittee shall collect and record on a monthly basis the following information:

- a. the name and identification number of each sealer and adhesive applied to metallic surfaces; and
- b. the VOC content, excluding water and exempt solvents, of each sealer and adhesive applied to metallic surfaces.



[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) For purposes of compliance with the emissions limitation for glass adhesion body primers (4.9 pounds VOC per gallon, excluding water and exempt solvents) the permittee shall collect and record on a monthly basis the following information:
- a. the name and identification number of each glass adhesion body primer utilized; and
  - b. the VOC content, excluding water and exempt solvents, of each glass adhesion body primer utilized.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) For purposes of compliance with the emissions limitation for sealers and adhesives (0.5 pound of VOC per gallon, excluding water and exempt solvents, on a monthly basis), the permittee shall collect and record the following information each month for this emissions unit:
- a. When using complying coatings for all sealers and adhesives:
    - i. the name and identification number of each sealer and adhesive, as applied; and
    - ii. the VOC content, excluding water and exempt solvents, of each sealer and adhesive, as applied.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

- b. When calculating a monthly volume-weighted average VOC content for the sealers and adhesives;
  - i. the name and identification number of each sealer and adhesive, as applied;
  - ii. the VOC content, excluding water and exempt solvents, and the number of gallons, excluding water and exempt solvents, of each sealer and adhesive, as applied; and
  - iii. the volume-weighted average VOC content of all sealer and adhesive, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) For purposes of compliance with the rolling, 12-month VOC emissions limitation for sealers and adhesives (55.06 tons), the permittee shall collect and record on a monthly basis the following information for all sealer and adhesive operations:
- a. the company identification for each sealer and adhesive utilized;



- b. the number of gallons of each sealer and adhesive utilized,  $SA_i$ ;
- c. the volatile organic compound content of each sealer and adhesive utilized, in pounds per gallon,  $VOC_i$ ;
- d. the total VOC emissions from all sealers and adhesives utilized, in tons;  $\sum_{i=1}^n (SA_i)(VOC_i) \div (2000 \text{ pounds/ton})$ ; and
- e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7515(d)	Each annual tune-up specified 63.7540(a)(10) must be no more than 13 months after the previous tune-up.
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director of any monthly record showing the use of a sealer or adhesive in this emissions unit that was applied to metallic surfaces which exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall



include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall notify the Director of any monthly record showing the use of a glass adhesion body primer which exceeded 4.9 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the 0.5 pound of VOC per gallon, excluding water and exempt solvents, emissions limitation. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all sealants and adhesives utilized in this emissions unit exceed 55.06 tons per rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (9) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations for sealers and adhesives emissions in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

0.5 pound of VOC per gallon, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4).

If, required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

3.5 pounds of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2).

If required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

4.9 pounds of VOC per gallon, excluding water and exempt solvents.



Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3).

If required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

55.06 tons VOC per rolling, 12-month period.

Applicable Compliance Method :

Compliance shall be determined through the monitoring and record keeping requirements of d)(5).

e. Emission Limitation:

0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3152.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) Compliance with the emission limitations for oven burner emissions in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60,



Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

5% opacity as a 6-minute average.

Applicable Compliance Method:

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

d. Emission Limitation:

0.083 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emission limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998, as follows: divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

4.37 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.083 pound of



CO per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.100 pound of NO<sub>x</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998 as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

5.26 tons of NO<sub>x</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.100 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 1.9 pounds of PE emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

i. Emission Limitation:

0.10 ton of PE per rolling, 12-month period.



Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0019 pound of PE per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

j. Emission Limitation:

0.0075 pound of PM10 per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 7.6 pounds of PM10 emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201A and 202 of 40 CFR Part 51 Appendix. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

k. Emission Limitation:

0.40 ton of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0075 pound of PM10 per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

l. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 7.6 pounds of PM2.5 emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201A



and 202 of 40 CFR Part 51 Appendix. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

m. Emission Limitation:

0.40 ton of PM<sub>2.5</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0075 pound of PM<sub>2.5</sub> per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

n. Emission Limitation:

0.0006 pound of SO<sub>2</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 0.6 pounds of SO<sub>2</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

o. Emission Limitation:

0.04 ton of SO<sub>2</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0006 pound of SO<sub>2</sub> per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

p. Emission Limitation:

0.0054 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:



This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

q. Emission Limitation:

0.29 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0054 pound of VOC per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements:
- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
  - b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
  - c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
  - d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
  - e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
  - f. maintain records of the tune-up, inspection, and any corrective actions taken; and
  - g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the annual schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10) through (13), and 40 CFR Part 63, Subpart DDDDD, Table 3]

g) Miscellaneous Requirements

- (1) None.



**17. P011, BIW Inspection and Grinding**

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

Body in white (BIW) inspection and grinding with the building enclosure utilized as control, TNAP

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 04-01102 as modified 9/8/05)	see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 through 20 (PTI 04-01102 as modified 9/8/05)	emissions of particulate matter equal to or less than 10 microns in diameter (PM10) shall not exceed: 0.48 pound per hour, and 2.1 tons per rolling, 12-month period
c.	OAC rule 3745-17-07(B)(1)	see b)(2)c.
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all grinding operations associated with this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to utilize adequate enclosure to contain, capture and control the fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1) and OAC rules 3745-31-10 through 20.

c. Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.



- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B), (B)(3).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
    - a. the location and color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]
  - (2) For emission points for which the weekly checks show emissions that are representative of normal operation for 26 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to weekly for that emission point until such time as there are 26 consecutive operating weeks of normal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]
  - (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102 as last modified on September 8, 2005: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]



e) Reporting Requirements

- (1) The permittee shall submit semiannual deviation (excursion) reports that identify:
  - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. any corrective actions taken eliminate the visible emissions.

The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102 as last modified on September 8, 2005:e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

- a. Emission Limitation:

visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-



03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation

0.48 pound PM10 per hour.

Applicable Compliance Method

This emissions limitation was established based on a company supplied emissions factor (0.48 pound PM10 per hour).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

2.1 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.48 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102 as last modified September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**18. P012, Finish welding**

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

Finish welding, TNAP

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) (P0108063 as issued 7/21/2011)	visible particulate emissions from the stack serving this emissions unit shall not exceed 5 percent opacity as a six-minute average  see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 through 20 (P0108063 as issued 7/21/2011)	emissions of particulate matter equal to or less than 10 microns in diameter (PM10) shall not exceed: 0.56 pound per hour, and 2.4 tons per rolling, 12-month period
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-07(B)(1)	see b)(2)d.
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.
f.	OAC rule 3745-17-11(B)(1)	see b)(2)c.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all grinding operations associated with this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to utilize adequate enclosure to contain, capture and control the fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1) and OAC rules 3745-31-10 through 20.



- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B), (B)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) For emission points for which the weekly checks show emissions that are representative of normal operation for 26 consecutive operating weeks, the required frequency of visible emissions checks may be reduced to monthly (once per month, when the emissions unit is in operation). If a subsequent check of such emission point by the



permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to weekly for that emission point until such time as there are 26 consecutive operating weeks of normal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
  - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
  - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation:

visible particulate emissions from the stack serving this emissions unit shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



b. Emission Limitation:

visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation

0.56 pound PM10 per hour.

Applicable Compliance Method

This emissions limitation was established based on the permittee supplied emissions factor of 0.56 pound PM10 per hour.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

2.4 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.56 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**19. P014, Purfoam**

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

application station for foam sound deadening

- 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.	ORC 3704.03(T) (P0108007 effective 7/21/2011)	emissions of volatile organic compounds (VOC) shall not exceed 0.14 pound per gallon of unreacted foam  see b)(2)a.
b.	OAC rule 3745-31-05(D) (P0108007 effective 7/21/2011)	emissions of VOC shall not exceed 8.67 tons as a rolling, 12-month summation  see b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(d)	emissions of VOC shall not exceed 3.5 pound per gallon of unreacted foam, excluding water and exempt solvents
d.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)c.
e.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	Except as otherwise allowed, average organic hazardous air pollutant (HAP) emissions from all deadener materials shall not exceed 0.010 kg/kg (lb/lb) of deadener material used during each month, as determined according to the requirements in 40 CFR 63.3150 through 63.3152  [63.3091(d)]



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subparts A and IIII.
- b. The maximum foam sound deadening usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$8.67 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

$Q_i$  = usage of unreacted foam sound deadener material  $i$ , gallons  
 $VOC_i$  = the mass of VOC (emitted) per volume of unreacted foam sound deadener material  $i$ , pounds per gallon.

- c. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

c) Operational Restrictions

The permittee shall employ techniques appropriate to minimize the emissions of VOC from this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (1) The maximum coating usage for this emissions unit shall not exceed the limit calculated by the following formula:  $2000E \geq \sum_{i=1}^n (Q_i)(VOC_i)$

Where:

$E$  = cumulative VOC emissions, in tons

$Q_i$  = usage of unreacted foam sound deadener material  $i$ , gallons

$VOC_i$  = the mass of VOC (emitted) per volume of unreacted foam sound deadener material  $i$ , pounds per gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices



63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3152(a) through (c)	Continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

The permittee shall collect and record monthly the mass of VOC (emitted) per unreacted volume of each foam sound deadener as injected, in pounds per gallon of unreacted foam, excluding water and exempt solvents.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (1) The permittee shall collect and record on a monthly basis the following information for all foam sound deadener operations:
  - a. the company identification for each unreacted foam sound deadener utilized;
  - b. the number of gallons of each unreacted foam sound deadener utilized,  $Q_i$ ;
  - c. the mass of VOC (emitted) per volume of unreacted foam sound deadener material,  $VOC_i$ ;
  - d. the total VOC emissions from all foam sound deadener materials utilized, in tons;  $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$  pounds/ton;
  - e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Requirements for record retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) **Reporting Requirements**

- (1) The permittee shall notify the Director of any monthly record showing the use of noncomplying coatings, i.e., any coating for which emissions of VOC exceeds 3.5



pounds of per gallon of unreacted foam excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation reports that identify the following:
  - a. any monthly record showing the use of noncomplying coatings, i.e., any coating for which emissions of VOC exceeds 0.14 pound of per gallon of unreacted foam;
  - b. any exceedance of the rolling, 12-month emissions limitation.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
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[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
0.14 pound of VOC per gallon.  
  
Applicable Compliance Method:  
  
If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



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b. Emission Limitation:

3.5 pounds of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

8.67 tons of VOC as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2)e.

d. Emission Limitation:

0.010 kg/kg (lb/lb) HAP.

Applicable Compliance Method:

In accordance with 40 CFR 63.7 and 40 CFR 63.3152, the permittee shall determine the individual organic HAP content for each group of materials used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**20. P401 - Window Installation**

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

Window installation with control by appropriate work practices, Supplier Park

- 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
all window installation operations		
a.	OAC rule 3745-31-05(A)(3) (in (P0108007 effective 7/21/2011.	Emissions from the operation of this emissions unit shall not exceed 8.2 pounds of volatile organic compounds (VOC) per hour, and see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-21 through 27 (P0111000 effective 12/4/2012)	See b)(2)c. through b)(2)f.
c.	OAC rule 3745-21-09(U)(1)(g)	See b)(2)g.
d.	OAC rule 3745-21-09(U)(1)(i)	See b)(2)h.
e.	40 CFR Part 63, Subpart A (63.1 through 63.16)	See b)(2)i.
f.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)j.  [63.3091(a) and (b)]



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-21 thru 27, OAC rules 3745-21-09(U)(1)(g), (U)(1)(i), and 40 CFR Part 63 Subparts A and IIII.
- b. The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at a company supplied emissions factor of 0.10 pound per job and a maximum production capacity of 82 jobs per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(g), (U)(1)(i) and 40 CFR Part 63, Subparts A and IIII.
- d. The monthly volume weighted average emissions from all sealers and primers utilized in this emissions unit shall not exceed 0.4 pound of volatile organic compounds (VOC) per gallon, minus water and exempt solvents.
- e. The combined emissions from all sealers and primers utilized in this emissions unit shall not exceed 10.0 tons of VOC per rolling, 12-month period.
- f. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$10.0 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

$Q_i$  = usage of sealer or primer material  $i$ , gallons

$VOC_i$  = the mass of VOC (emitted) per volume of sealer or primer material  $i$ , pounds per gallon.

- g. The emissions of VOC from all glass adhesion body primers shall not exceed 4.9 pounds of volatile organic compounds (VOC) per gallon, minus water and exempt solvents, as a daily volume weighted average.
- h. The emissions of VOC from all sealers applied to metallic surfaces shall not exceed 3.0 pounds of VOC per gallon, minus water and exempt solvents, as a daily volume weighted average.
- i. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- j. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners,



except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

c) Operational Restrictions

- (1) The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee may elect to comply with the emissions limitation for VOC content as a monthly maximum, or as a daily volume weighted average of the materials used in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (2) When compliance with the VOC emissions limitation for glass adhesion body primers is being demonstrated through the use of compliance coatings (i.e., each glass adhesion body primer utilized complies with the applicable limitation of 4.9 pounds of VOC per gallon as applied), the permittee shall collect and record the following information each month for this emissions unit:

- a. the name and identification number of each glass adhesion body primer, as applied; and
- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

- (3) When compliance with the VOC emissions limitation for glass adhesion body primers is being demonstrated as a daily volume weighted average, the permittee shall collect and record the following information each day:

- a. the name and identification number of each glass adhesion body primer, as applied;
- b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each glass adhesion body primer, as applied; and
- c. the daily volume-weighted average VOC content of all glass adhesion body primers, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

[Authority for term: OAC rule 3745-21-09(B)(3)(h) and OAC rule 3745-77-07(C)(1)]

- (4) When compliance with the VOC emissions limitation for sealers applied to metallic surfaces is being demonstrated through the use of compliance coatings (i.e., each coating utilized complies with the applicable limitation of 3.0 pounds of VOC per gallon as applied), the permittee shall collect and record the following information each month:

- a. the name and identification number of each sealer applied to metallic surfaces, as applied; and
- b. VOC content (excluding water and exempt solvents) of each sealer applied to metallic surfaces, as applied.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

- (5) When compliance with the VOC emissions limitation for sealers applied to metallic surfaces is being demonstrated as a daily volume weighted average, the permittee shall collect and record the following information each day:

- a. the name and identification number of each sealer applied to metallic surfaces, as applied;



- b. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each sealer applied to metallic surfaces, as applied; and
- c. the volume weighted average VOC content of all sealers applied to metallic surfaces, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

[Authority for term: OAC rule 3745-21-09(B)(3)(h) and OAC rule 3745-77-07(C)(1)]

- (6) For purposes of compliance with the monthly volume weighted average emissions from all sealers and primers utilized in this emissions unit (0.4 pound of VOC per gallon), the permittee shall collect and record the following information each month:
  - a. the name and identification number of each sealer and primer utilized in this emissions unit, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each sealer and primer utilized in this emissions unit, as applied; and
  - c. the monthly volume-weighted average VOC content of all sealers and primers utilized in this emissions unit, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

[Authority for term: OAC rule 3745-21-09(B)(3)(h) and OAC rule 3745-77-07(C)(1)]

- (7) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:
  - a. the company identification for each sealer or primer utilized;
  - b. the volume of each sealer or primer applied during the month,  $Q_i$ , in gallons;
  - c. the mass of VOC (emitted) per volume of each sealer or primer applied during the month,  $VOC_i$ , in pounds per gallon;
  - d. the total VOC emissions from all sealers and primers utilized, in tons;  $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$  pounds/ton), in tons per month;
  - e. the rolling, 12-month summation of VOC emissions, in tons per year.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:



63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall notify the Director of any monthly glass adhesion body primer or sealer record showing the use of noncomplying materials. The notification shall include a copy of such record and shall be sent to the Director following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (2) The permittee shall notify the Director of any daily glass adhesion body primer or sealer record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the sealer and primer VOC content exceeded the applicable limitation (0.4 pound of VOC per gallon).

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum sealer and primer utilization exceeds the applicable limitation, i.e.,  $(\sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 10.0$  tons in any rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (6) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
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[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]



- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

For all glass adhesion body primers: 4.9 pounds of VOC per gallon, minus water and exempt solvents, as a daily volume weighted average

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d).

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

For all sealers applied to metallic surfaces: 3.0 pounds of VOC per gallon, minus water and exempt solvents, as a daily volume weighted average

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d).

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.4 pound of VOC per gallon excluding water and exempt solvents, as a monthly volume weighted average.



Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d).

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

8.2 pounds of VOC per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation, based upon the worst case operating scenario (82 jobs per hour) and a company supplied emissions factor (0.10 pound VOC per job). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

10.0 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(7)e. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

g. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.



**Preliminary Proposed Title V Permit**  
Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**21. P402 - Miscellaneous Solvents**

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

Miscellaneous solvents with control by appropriate work practices, Supplier Park

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) (P0111000 effective 12/4/2012)	See b)(2)a.
b.	OAC rules 3745-31-21 through 27 (P0111000 effective 12/4/2012)	7.0 tons VOC per rolling, 12-month period, and see b)(2)b.
c.	40 CFR Part 63, Subpart A (63.1 through 63.16)	See b)(2)c.
d.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)d.  [63.3091(a) and (b)]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 through 27, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart IIII.

b. The maximum solvent usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:



$$7.0 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

$Q_i$  = usage of solvent material  $i$ , gallons

$VOC_i$  = volatile organic compound content of material  $i$ , pounds per gallon

- c. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

c) Operational Restrictions

- (1) The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements



63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of compliance with the rolling, 12-month VOC emissions limitation for solvent materials (7.0 tons), the permittee shall collect and record on a monthly basis the following information for all operations:
  - a. the company identification for each solvent utilized;
  - b. the number of gallons of each solvent utilized,  $Q_i$ ;
  - c. the volatile organic compound content of each solvent utilized, in pounds per gallon,  $VOC_i$ ;
  - d. the total VOC emissions from all solvent materials utilized, in tons;  $\sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$  and
  - e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(d) through (f)	Recordkeeping requirements specified for cleaning materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all solvents utilized in this emissions unit exceed 7.0 tons per rolling, 12-month period.



[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
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[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

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

a. **Emission Limitation:**

7.0 tons of VOC per rolling, 12-month period.

**Applicable Compliance Method:**

Compliance shall be determined through the monitoring and record keeping requirements of d)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. **Emission Limitation:**

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

**Applicable Compliance Method:**

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

c. **Emission Limitation:**

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.



**Preliminary Proposed Title V Permit**  
Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



**22. Emissions Unit Group - 10.52 mmBtu/hr NG heaters: B020, B022,**

EU ID	Operations, Property and/or Equipment Description
B020	10.52 mmBtu per hour natural gas-fired makeup air heater (ASH 1-8), TNAP
B022	10.52 mmBtu per hour natural gas-fired makeup air heater (ASH 2-8), TNAP

- 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 04-01102 modified 9/8/05)	emissions from each emissions unit shall not exceed:  0.02 pound per mmBtu and 0.93 ton of carbon monoxide (CO) per rolling, 12-month period; 4.6 tons of nitrogen oxides (NOx) per rolling, 12-month period; and 0.24 ton of volatile organic compounds (VOC) per rolling, 12-month period  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-10 through 20	emissions from each emissions unit shall not exceed:  0.1 pound NOx per mmBtu; and 0.0052 pound VOC per mmBtu  see b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)d.
e.	OAC rule 3745-18-06(A)	see b)(2)e.



(2) Additional Terms and Conditions

- a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 through 20.
- c. Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average.
- d. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]



- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102, issued on September 8, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) **Reporting Requirements**

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, issued on September 8, 2005: e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these



requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

b. Emission Limitation:

0.02 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

0.93 ton of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.020 pound of CO per mmBtu by the maximum heat input capacity of 10.52 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.



d. Emission Limitation:

0.1 pound of NO<sub>x</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

4.6 tons of NO<sub>x</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.1 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 10.52 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.0052 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.24 ton of VOC per rolling, 12-month period.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0052 pound of VOC per mmBtu by the maximum heat input capacity of 10.52 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, issued on September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.

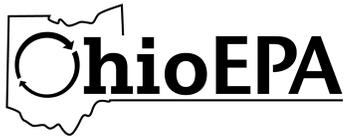


**23. Emissions Unit Group - 12.02 mmBtu/hr direct fired natural gas heaters: B011, B014, B016, B017, B019, B028, B031**

EU ID	Operations, Property and/or Equipment Description
B011	12.02 mmBtu per hour natural gas-fired makeup air heater (ASH 1-2), TNAP
B014	12.02 mmBtu per hour natural gas-fired makeup air heater (ASH 2-3), TNAP
B016	12.02 mmBtu per hour natural gas-fired makeup air heater (ASH 1-5), TNAP
B017	12.02 mmBtu per hour natural gas-fired makeup air heater (ASH 2-5), TNAP
B019	12.02 mmBtu per hour natural gas-fired makeup air heater (ASH 2-2), TNAP
B028	12.02 mmBtu per hour natural gas, direct-fired air makeup unit (ASH E), TNAP
B031	12.02 mmBtu per hour natural gas, direct-fired air space heater (ASH J), TNAP

- 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 04-01102 modified 9/8/05)	emissions from each emissions unit shall not exceed;  0.02 pound per mmBtu and 1.1 tons of carbon monoxide (CO) per year; 5.3 tons of nitrogen oxides (NOx) per year; and 0.28 ton of volatile organic compounds (VOC) per year  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-10 through 20	emissions from each emissions unit shall not exceed:  0.1 pound NOx per mmBtu; and 0.0052 pound VOC per mmBtu  see b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)d.
e.	OAC rule 3745-18-06(A)	see b)(2)e.



(2) Additional Terms and Conditions

- a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 through 20.
- c. Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average.
- d. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]



- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102, issued on September 8, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) **Reporting Requirements**

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, issued on September 8, 2005: e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these



requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

b. Emission Limitation:

0.02 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

1.1 tons of CO per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.02 pound of CO per mmBtu by the maximum heat input capacity of 12.02 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.



d. Emission Limitation:

0.1 pound of NO<sub>x</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

5.3 tons of NO<sub>x</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.1 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 12.02 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.0052 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.28 ton of VOC per year.



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Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0052 pound of VOC per mmBtu by the maximum heat input capacity of 12.02 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, issued on September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**24. Emissions Unit Group - 13.53 mmBtu/hr NG heaters: B018, B021, B026&B027**

EU ID	Operations, Property and/or Equipment Description
B018	13.53 mmBtu per hour natural gas-fired makeup air heater (ASH 1-6), TNAP
B021	13.53 mmBtu per hour natural gas-fired makeup air heater (ASH 2-6), TNAP
B026	13.53 mmBtu per hour natural gas-fired makeup air heater (ASH B), TNAP
B027	13.53 mmBtu per hour natural gas-fired makeup air heater (ASH C), TNAP

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 04-01102 modified 9/8/05)	emissions from each emissions unit shall not exceed:  0.02 pound per mmBtu and 1.2 tons of carbon monoxide (CO) per year; 6.0 tons of nitrogen oxides (NOx) per year; and 0.31 ton of volatile organic compounds per year  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-10 through 20	emissions from each emissions unit shall not exceed:  0.1 pound NOx per mmBtu; and 0.0052 pound VOC per mmBtu.  see b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)d.
e.	OAC rule 3745-18-06(A)	see b)(2)e.



(2) Additional Terms and Conditions

- a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 through 20.
- c. Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average.
- d. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]



- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102, issued on September 8, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) **Reporting Requirements**

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, issued on September 8, 2005: e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these



requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

b. Emission Limitation:

0.02 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

1.2 tons of CO per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.020 pound of CO per mmBtu by the maximum heat input capacity of 13.53 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.



d. Emission Limitation:

0.1 pound of NO<sub>x</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

6.0 tons of NO<sub>x</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.1 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 13.53 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.0052 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.31 ton of VOC per year.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0052 pound of VOC per mmBtu by the maximum heat input capacity of 13.53 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, issued on September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**25. Emissions Unit Group -15.03 mmBtu/hr dir fired NG heat: B012,B013,B015,B023,B024,B025,**

EU ID	Operations, Property and/or Equipment Description
B012	15.03 mmBtu per hour natural gas-fired makeup air heater (ASH 1-3), TNAP
B013	15.03 mmBtu per hour natural gas-fired makeup air heater (ASH 1-4), TNAP
B015	15.03 mmBtu per hour natural gas-fired makeup air heater (ASH 2-4), TNAP
B023	15.03 mmBtu per hour natural gas-fired makeup air heater (ASH 1-10), TNAP
B024	15.03 mmBtu per hour natural gas-fired makeup air heater (ASH 2-10), TNAP
B025	15.03 mmBtu per hour natural gas-fired makeup air heater (ASH A), TNAP

- 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 04-01102 modified 9/8/05)	emissions from each emissions unit shall not exceed:  0.02 pound per mmBtu and 1.4 tons of carbon monoxide (CO) per year; 6.6 tons of nitrogen oxides (NOx) per year; and 0.35 ton of volatile organic compounds (VOC) per year  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-10 through 20	emissions from each emissions unit shall not exceed:  0.1 pound NOx per mmBtu; and 0.0052 pound VOC per mmBtu  see b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)c.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)d.
e.	OAC rule 3745-18-06(A)	see b)(2)e.



(2) Additional Terms and Conditions

- a. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A) and 3745-31-10 through 20.
- c. Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity as a six-minute average.
- d. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]



- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-01102, issued on September 8, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

- (2) [Authority for term: OAC rule 3745-77-07(C)(1)]The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-01102, issued on September 8, 2005: e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

b. Emission Limitation:

0.02 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 20 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

1.4 tons of CO per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.02 pound of CO per mmBtu by the maximum heat input capacity of 15.03 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

d. Emission Limitation:

0.1pound of NOx per mmBtu of heat input.



Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

6.6 tons of NO<sub>x</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.1 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 15.03 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.0052 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA FIRE software v6.24, as follows: divide the emission factor of 5.3 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.35 ton of VOC per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0052 pound



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of VOC per mmBtu by the maximum heat input capacity of 15.03 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, issued on September 8, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**26. Emissions Unit Group - 32.66 mmBtu/hr NG boilers: B008, B009, B010**

EU ID	Operations, Property and/or Equipment Description
B008	32.66 mmBtu per hour natural gas-fired boiler; Hot water generator #1, TNAP
B009	32.66 mmBtu per hour natural gas-fired boiler; Hot water generator #2, TNAP
B010	32.66 mmBtu per hour natural gas-fired boiler; Hot water generator #3, TNAP

- 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 P0115635 issued 12/17/2013)	emissions from the stack serving each emissions unit shall not exceed:  0.083 pound per mmBtu and 11.9 tons of carbon monoxide (CO) per year; 7.0 tons of nitrogen oxides (NOx) per year; 1.07 tons of particulate matter less than or equal to 10 microns in diameter (PM10) per year; 0.0006 pound per mmBtu and 0.09 ton of sulfur dioxide (SO2) per year; and 0.78 ton per year of volatile organic compounds (VOC).  see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-10 through 20 and 40 CFR 52.21 (PTI P0115635 issued 12/17/2013)	emissions from the stack serving each emissions unit shall not exceed:  0.049 pound NOx per mmBtu; 0.0075 pound PM10 per mmBtu; and 0.0054 pound VOC per mmBtu  see b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)d.
d.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the stack



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		serving each emissions unit shall not exceed 0.020 pound per million Btu of actual heat input
e.	OAC rule 3745-18-06(A)	see b)(2)e.
f.	40 CFR Part 60, Subpart A (40 CFR 60.01 through 60.19)	see b)(2)f. and b)(2)g.
g.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c through 60.48c)  In accordance with 40 CFR 60.40c(a), this emissions unit is a steam generating unit which commenced construction after June 9, 1989 that has a maximum design heat input capacity less than 100 mmBtu/hr, but greater than 10 mmBtu/hr subject to the emission limitations/control measures specified in this section.	see b)(2)g. through b)(2)h.  (60.42c and 60.43c)
h.	40 CFR Part 63, Subpart A (40 CFR 63.1 through 63.16)	see b)(2)i.
i.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is an existing boiler in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section.	Boilers not subject to emission standards shall meet the tune-up requirements identified in Table 3 as applicable to the unit.  See b)(2)j. and b)(2)k.  [40 CFR 63.7500]

(2) Additional Terms and Conditions

- a. Visible particulate emissions from the stack serving this emissions unit shall not exceed five percent opacity as a six-minute average.
- b. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.



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- c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A), 3745-31-10 through 20, and 40 CFR Part 60 Subpart Dc.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

- f. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- g. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- h. 40 CFR Part 60, Subpart Dc does not establish particulate matter or SO<sub>2</sub> emission limitations for this affected steam generating unit because the emissions unit employs only natural gas as fuel. Table 10 to 40 Part 63 Subpart DDDDD provides applicability provisions, definitions, and other general provisions of 40 CFR Part 63, Subpart A that are applicable to 40 CFR Part 63, Subpart DDDDD.
- i. Following the initial compliance date, tune-ups must be conducted for each boiler within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing boiler no later than 1/31/16; unless the boiler is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.



- j. For each existing boiler a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:
  - i. A visual inspection of the boiler system;
  - ii. An evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
  - iii. An inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
  - iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
  - v. A review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
  - vi. A list of cost-effective energy conservation measures that are within the permittee's control;
  - vii. A list of the energy savings potential of the energy conservation measures identified; and
  - viii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-06(A)]

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:



Table 3 to Subpart DDDDD	Work practices
63.7540(a)(10)	Annual tune-up requirement

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.48c(g)	the permittee shall record and maintain records of the amount of each fuel combusted during each calendar month
60.48c(i)	record retention requirements

[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7515(d)	Each annual tune-up specified 63.7540(a)(10) must be no more than 13 months after the previous tune-up.
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]



- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

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

- a. Emission Limitation:

5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission Limitation:

0.083 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission Limitation:

11.9 tons of CO per year.



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Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.083 pound of CO per mmBtu by the maximum heat input capacity of 32.66 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

d. Emission Limitation:

0.049 pound of NO<sub>x</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 50 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

7.0 tons of NO<sub>x</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.049 pound of NO<sub>x</sub> per mmBtu by the maximum heat input capacity of 32.66 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.020 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This applicable limitation is less than the emissions estimated based on calculations utilizing the emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.



If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

0.0075 pound of PM<sub>10</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM<sub>10</sub> per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51 Appendix M. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

h. Emission Limitation:

1.07 ton of PM<sub>10</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0075 pound of PM<sub>10</sub> per mmBtu by the maximum heat input capacity of 32.66 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

i. Emission Limitation:

0.0006 pound of SO<sub>2</sub> per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO<sub>2</sub> emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and



procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

j. Emission Limitation:

0.09 ton of SO<sub>2</sub> per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.0006 pound of SO<sub>2</sub> per mmBtu by the maximum heat input capacity of 32.66 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

k. Emission Limitation:

0.0054 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

l. Emission Limitation:

0.78 ton of VOC per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0054 pound of VOC per mmBtu by the maximum heat input capacity of 32.66 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements:



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
- b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
- c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
- d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
- e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the annual schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10) through (13), and 40 CFR Part 63, Subpart DDDDD, Table 3]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 04-01102, as last modified on September 8, 2005: f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**27. Emissions Unit Group -Automotive off-line repair booth: K008,K009,K010,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K008	Clean Shop Booth #1, TNAP
K009	Clean Shop Booth #2, TNAP
K010	Clean Shop Booth #3, TNAP

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 04-747 issued 7/13/92)	the combined emissions of volatile organic compounds (VOC) from emissions units K008, K009, and K010 shall not exceed 38.4 pounds per day as a monthly average  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI 04-747 issued 7/13/92)	the combined emissions of VOC from emissions units K008, K009, and K010 shall not exceed 6.0 tons as a rolling, 12-month summation
c.	OAC rule 3745-17-07(A)(1)	visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule
d.	OAC rule 3745-17-11(B)(1)	particulate emissions (PE) from the stack(s) serving this emissions unit shall not exceed 0.551 pound per hour
e.	OAC rule 3745-17-11(C)(1), (C)(2)	see b)(2)c. and b)(2)d.
f.	OAC rule 3745-21-09(C)(1)(d)	the emissions of VOC from uncontrolled final repair coating lines shall not exceed 4.8 pounds per gallon of coating, excluding water and exempt solvents
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)e.
h.	40 CFR Part 63, Subpart IIII	see b)(2)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	[63.3091(a)]

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d).
- b. The permittee is not claiming any VOC emission reduction credits from the activated carbon filters utilized on this emissions unit.
- c. Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, in lieu of b)(1)d. the permittee shall comply with the following:
 

The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a dry filtration system, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).
- d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These requirements shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan. Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, then these emission limitations/control measures no longer apply: b)(1)d., c)(1), d)(1), e)(1) and f)(1)b.
- e. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- f. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;



or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (2) Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, in lieu of c)(1) the permittee shall comply with the following:

- a. The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-17-11(C)(1), (2)(b)]

- b. In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-17-11(C)(2)(e)]

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the 4.8 pounds of VOC per gallon of coating emissions limitation by the exclusive use of compliance coatings, i.e., each coating utilized shall comply with the applicable emissions limitation as applied.

[Authority for term: OAC rule 3745-77-07(A)(1)]



- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3092(a),(b)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from requirements for operating limitations
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a) through (j)	Continuous compliance demonstration
63.3163(a) through (c)	Alternate continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, in lieu of d)(1) the permittee shall comply with the following:

- a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, 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 Toledo Division of Environmental Services upon request.

[Authority for term: OAC 3745-17-11(C)(2)(a)]

- b. The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-17-11(C)(2)(c)]

- c. In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-17-11(C)(2)(c)]



- d. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - i. the date of the inspection;
  - ii. a description of each/any problem identified and the date it was corrected;
  - iii. a description of any maintenance and repairs performed; and
  - iv. 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.

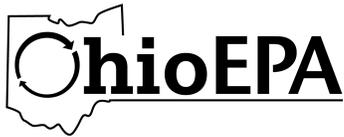
[Authority for term: OAC rule 3745-17-11(C)(2)(d), (f)]

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e), (f), (g)]

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall collect and record the following information each month for emissions units K008, K009 and K010 combined, for the purpose of determining average daily and annual VOC emissions:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - d. the name and identification of each cleanup material employed;
  - e. the VOC content of each cleanup material, in pounds per gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;



- h. the rolling 12-month summation of emissions from all coatings and cleanup materials employed, in tons per year;
- i. the number of days in which one or more of the emissions units was in operation; and
- j. the daily average VOC emissions rate for emissions units K008, K009 and K010 combined, (g)/(i), in pounds per day.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f)]

- (4) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Requirements for record retention and format

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-747 as issued July 13, 1992: d)(1) through (d)(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all records showing that the dry filtration system was not in service when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Once U.S. EPA approves the February 1, 2008 version of OAC rule 3745-17-11, in lieu of e)(1) the permittee shall comply with the following:

The permittee shall submit deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.



[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

- (3) The permittee shall notify the Director of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the total pounds of VOC per day or the total tons of VOC per rolling, 12-month period for K008 through K010 exceeds the applicable limitations. The notification shall include a copy of such record.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-747 as issued July 13, 1992:e)(1) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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



a. Emission Limitation:

20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

0.551 pound PE per hour.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (as PE in pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods 1 through 5 of 40 CFR Part 40, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

4.8 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of OAC rule 3745-21-09(B)(3); utilizing the methods and procedures



of OAC rule 3745-21-10(B). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

38.4 pounds per day of VOC as a monthly average for emissions units K008, K009, and K010, combined.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the monitoring and record keeping requirements of d)(3).

e. Emission Limitation:

6.0 tons per year of VOC as a rolling, 12-month summation for emissions units K008, K009, and K010, combined.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the monitoring and record keeping requirements of d)(3).

f. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

g. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install



04-747 as issued July 13, 1992: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

(1) None.



**28. Emissions Unit Group - Offline repair: K402, K403,**

EU ID	Operations, Property and/or Equipment Description
K402	Automotive off-line repair with dry filtration and electric infrared oven, Supplier Park
K403	Automotive off-line repair with dry filtration and electric infrared oven, Supplier Park

- 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
	clean shop repair station with dry filtration and an electric infrared oven	
a.	OAC rule 3745-31-05(A)(3) (P0111000 effective 12/4/2012)	Emissions from the stack associated with the repair booth shall not exceed: 0.551 pound of particulate emissions (PE) per hour, 1.6 pounds of particulate matter equal to or less than 10 microns in diameter (PM10) per hour, 1.85 tons of PM10 per year, 0.40 pound of volatile organic compounds (VOC) per hour, 5% opacity as a 6-minute average, and see b)(2)a. through b)(2)d.
b.	OAC rules 3745-31-10 through 20 (P0111000 effective 12/4/2012)	Emissions from the stack associated with the repair booth shall not exceed: 2.4 tons of PE per rolling, 12-month period, and see b)(2)e. and b)(2)f.
c.	OAC rules 3745-31-21 through 27 (P0111000 effective 12/4/2012)	Emissions from the stack associated with the repair booth shall not exceed: 0.5 ton of VOC per rolling, 12-month period, see b)(2)g. and b)(2)h.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)i.
e.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
f.	OAC rule 3745-21-09(C)(1)(d)	See b)(2)j.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)k.
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)l.  [63.3091(a) and (b)]
sanding station(s)with dry filtration		
i.	OAC rule 3745-31-05(A)(3) (P0111000 effective 12/4/2012)	Emissions from the stack associated with the sanding operations shall not exceed: 0.65 pound of PM10 per hour, 1.85 tons of PM10 per year, 5% opacity as a 6 minute average, and see b)(2)b. and b)(2)m.
j.	OAC rule 3745-31-10 through 20 (P0111000 effective 12/4/2012)	2.4 tons of PE per rolling 12-month period, and see b)(2)e. and b)(2)f.
k.	OAC rule 3745-17-07(A)(1)	See b)(2)i.
l.	OAC rule 3745-17-11(B)(1)	emissions from the stack associated with the sanding station(s) shall not exceed 0.551 pound of PE per hour

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d), OAC rules 3745-31-10 through 27 and 40 CFR Part 63, Subparts A and IIII.
- b. The permittee shall allow no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at a company supplied emissions factor of 0.0048 pound per job and a maximum production capacity of 82 jobs per hour. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- d. The hourly PM10 emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit at a company supplied controlled emissions factor of 0.0185 pound per job and a maximum production capacity of



82 jobs per hour. Therefore, provided the fabric filtration system in use, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

- e. All of the operations comprising this emissions unit that generate particulate emissions shall be enclosed and all particulate emissions shall be exhausted through a particulate control system providing a minimum 98% overall control efficiency.
- f. The combined emission from the sanding and coating in all repair operations located at the final assembly facility (K402, K403 and K407) shall not exceed 1.85 tons of PM10 per rolling, 12-month period.
- g. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d).
- h. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$0.5 \text{ ton VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

$Q_i$  = usage of coating material  $i$ , gallons

$VOC_i$  = the mass of VOC (emitted) per volume of coating material  $i$ , pounds per gallon.

- i. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- j. Emissions from the operation of this emissions unit shall not exceed 4.8 pounds of VOC per gallon as a daily volume weighted average of coating, excluding water and exempt solvents.
- k. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- l. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;



or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

m. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1) and 3745-31-10 through 20.

c) Operational Restrictions

(1) All of the operations comprising this emissions unit shall be enclosed and all emissions shall be exhausted through a dry filtration system.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) The permittee shall operate the dry filtration system whenever the respective emissions source is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3163(a) through (c)	Continuous compliance demonstration

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when this emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee may elect to record only materials applied to metallic surfaces to comply with the VOC content restriction for coatings used in this emissions unit (4.8 pounds of



VOC per gallon of coating), as a monthly maximum for all coatings utilized, or as a monthly volume weighted average.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) When compliance is being demonstrated through the use of compliance coatings (i.e., each coating utilized shall comply with the applicable limitation of 4.8 pounds of VOC per gallon as applied), the permittee shall collect and record the following information each month for this emissions unit;
- a. the name and identification number of each coating, as applied, and
  - b. the VOC content (excluding water and exempt solvents) of each coating, as applied.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

- (4) When compliance is being demonstrated through the use of a daily volume weighted average of the materials used in this emissions unit, the permittee shall collect and record the following information each day for this emissions unit;
- a. the name and identification number of each coating, as applied;
  - b. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
  - c. the volume weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

[Authority for term: OAC rule 3745-21-09(B)(3)(h) and OAC rule 3745-77-07(C)(1)]

- (5) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:
- a. the company identification for each coating utilized;
  - b. the volume of each coating applied during the month,  $Q_i$ , in gallons;
  - c. the mass of VOC (emitted) per volume of each coating applied during the month,  $VOC_i$ , in pounds per gallon;
  - d. the total VOC emissions from all coatings utilized, in tons;  $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$  pounds/ton), in tons per month;
  - e. the rolling, 12-month summation of VOC emissions, in tons per year.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.



Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

[Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when the dry filtration system was not in service when the respective emissions source was in operation.

[Authority for term: PTI 04-01359 and OAC rule 3745-77-07(C)(1)]

- (2) When compliance with the 4.8 pounds of VOC per gallon limitation is being demonstrated through the use of compliance coatings, the permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (3) When compliance with the 4.8 pounds of VOC per gallon limitation is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(i)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the coating VOC content exceeded the applicable limitation (4.8 pounds of VOC per gallon).

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e.,  $(\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 0.5$  ton in any rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c)]

- (7) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3120(a)	Semiannual compliance report content
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- (8) [Authority for term: 40 CFR Part 63 and OAC rule 3745-77-07(C)(1)] Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

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

a. **Emission Limitation:**

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from any stack serving this emissions unit.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. **Emission Limitation:**

no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3).



Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.551 pound of PE per hour.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) (1-TE) (1-CE)$$

where:

E = particulate emission rate (pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment. If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

2.4 tons of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.551 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

98% control of particulate emissions.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10)(b). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

1.6 pounds of PM10 per hour.

Applicable Compliance Method:

This emissions limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs per hour) and a company supplied emissions factor (0.0185 pound PM10 per job).

If required, the permittee shall determine a site specific emissions factor, in pounds of PM10 per job, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

1.85 tons of PM10 per year.

Applicable Compliance Method:

If required, the permittee shall establish site specific emission factors, in grains per standard cubic foot, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and evaluate the site specific volumetric flow in accordance with Methods 1 thru 4 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

The combined emissions of PM10 from K402, K403 and K407 shall not exceed 1.85 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for emissions units K402, K403 and K407, as follows:

$(1-98\%)[(0.096 \text{ pound PM10/station-hour})(3 \text{ stations})(8760 \text{ hours/year}) + (23,400 \text{ gallons coating})(0.80 \text{ pound of solids/gallon coating})(15.0 \text{ pounds/gallon of coating})(1-0.35 \text{ pounds emitted/pound applied})] \div 2000 \text{ pounds/ton} = 1.85 \text{ tons of PM10 per year}$



If required, the permittee shall establish site specific emission factors in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and evaluate the site specific volumetric flow in accordance with Methods 1 thru 4 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

i. Emission Limitation:

4.8 pounds of VOC per gallon as a daily volume weighted average of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping and reporting requirements of d). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

j. Emission Limitation:

0.40 pound of VOC per hour.

Applicable Compliance Method:

This emission limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.0048 pound VOC/job).

If required, compliance shall be demonstrated by an evaluation performed in accordance with 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



**Preliminary Proposed Title V Permit**

Chrysler Group LLC - Toledo North Assembly

**Permit Number:** P0088135

**Facility ID:** 0448010414

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

k. Emission Limitation:

0.5 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(5)e. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163.

m. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.