



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

4/22/2014

Certified Mail

Mr. Roger Brown
 Chrysler Group LLC- Wrangler Paint Facility
 4400 Chrysler Drive
 Toledo, OH 43608

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0448011731
 Permit Number: P0116662
 Permit Type: Administrative Modification
 County: Lucas

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

Dear Permit Holder:

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

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
 TDES; Michigan; Indiana; Canada

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Chrysler Group LLC- Wrangler Paint Facility

Issue Date: 4/22/2014
Permit Number: P0116662
Permit Type: Administrative Modification
Permit Description: Administrative modification to remove grain loading requirement.
Facility ID: 0448011731
Facility Location: Chrysler Group LLC- Wrangler Paint Facility
3800 Stickney Avenue,
Toledo, OH 43608
Facility Description: Automobile Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Brad Faggionato, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Chrysler Group, LLC owns and operates automobile manufacturing plants in Toledo, Ohio. This facility is referred to as the Wrangler Paint Facility (WPF) and was originally issued a permit to install in 2004 (PTI 04-01358). These emission units are off-line repairs of automobiles manufactured on site and have a group emission limit with the topcoat line (K303) for PM10 emissions. The grain loading requirement was removed from the group emission limit in K303 and needs to be removed from these emissions units as well.

3. Facility Emissions and Attainment Status:

Lucas County is currently in attainment status for all criteria pollutants; however in 2004 Lucas County was classified as 8-hr non-attainment for ozone.

The allowable emissions for this facility are:

pollutant	CO	NOx	PE	PM10	SO2	VOC
TPY	35.49	21.13	33.76	39.93	0.26	615.63

4. Source Emissions:

This administrative modification is to remove the grain loading requirement (gr/dscf) as a particulate emission limitation on particulate matter equal to or less than 10 microns in diameter in the stack exhaust gases on a group emission limit for K303, K404 and K405.

In a correspondence dated June 6, 2013, Chrysler indicated that the actual installed design of K303 varied significantly from the 2004 PTI application in that roughly 90% of the spray booth exhaust is recirculated back into the booth. This reduces the installed exhaust gas flow rate to approximately 10% of the 2004 design rate. Revised modeling that demonstrated acceptable impacts was submitted to account for this revision, which resulted in no changes to the original permit.

As initially proposed in 2004 a PM10 BACT determination was made establishing a restriction to 0.0015 grains per dry standard cubic foot of exhaust gas. At that time Chrysler asserted that the automotive industry had standardized this level of performance for water wash spray booth manufacturers to provide what was referred to as a 1.5 grain (per 1000 cfm) booth. Chrysler now indicates that for the system as installed, recycling of 90% of the exhaust gases may cause the equilibrium level of PM10 emissions in the exhaust gases to exceed 1.5 gr/1000 cfm, but coupled with the reduced exhaust flow, a lower overall level of PM10 emissions will be achieved. Chrysler now requests a review of the 2004



PM10 BACT to determine if the 0.0015 grains per dry standard cubic foot of exhaust gas restriction can be removed as a permit requirement for K303.

In the June 6, 2013 correspondence, Chrysler requested a review of the 2004 PM10 BACT determination to revise the BACT determination to 5 pounds per hour and 21.9 tons per year. Since this would result in an apparent reduction of allowable emissions (from 30 pounds per hour and 34.75 tons per year), it would be considered to be approvable if the original 0.0015 gr/dscf was determined to be superfluous. At the time the original 2004 BACT determination was made, Ohio EPA policy required three emissions limitations to be established for PSD enforceability: a technical restriction (gr/dscf), a pounds per hour limitation and tons per year (as a rolling 12-month summation). Ohio EPA was contacted on 7/11/13 for a determination on current policy.

On July 15, 2013 Ohio EPA advised this office that a search of the current BACT established no requirement to set BACT on a grain per cuft basis. Ohio EPA determined that a pound per hour and ton per year limitation was adequate to establish BACT for this source. Further Ohio EPA determined that no precedence existed for stack testing the incinerator associated with the coating application by the clear coat bells, and that no additional no stack testing would be required for this source at issuance of the permit to confirm compliance with the newly established BACT limitation.

5. Conclusion:

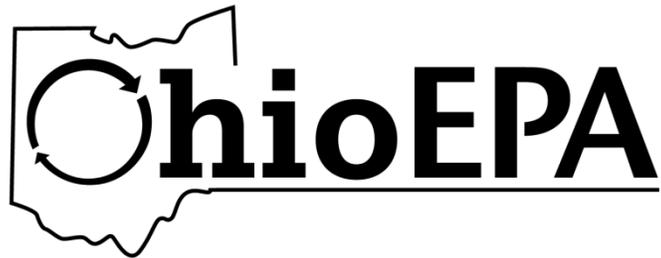
Therefore, the changes made to the group emission limit in K303 (P0115316) are being made to these emission limits. This will be made draft/final to make the changes federally enforceable.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	4.8 (no change)
PM10	2.47 (no change)
VOC	14.5 (no change)
CO	0 (no change)
SO2	0 (no change)
NOx	0 (no change)



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Chrysler Group LLC- Wrangler Paint Facility

Facility ID:	0448011731
Permit Number:	P0116662
Permit Type:	Administrative Modification
Issued:	4/22/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Chrysler Group LLC- Wrangler Paint Facility

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Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011731
Facility Description: Paint Shop portion of Automotive and Light Duty Truck Assembly
Application Number(s): M0002735
Permit Number: P0116662
Permit Description: Administrative modification to remove grain loading requirement.
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/22/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Chrysler Group LLC- Wrangler Paint Facility
3800 Stickney Avenue
Toledo, OH 43608

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install
 Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0116662
 Permit Description: Administrative modification to remove grain loading requirement.

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

Group Name: Rapid Reprocess 1 and 2

Emissions Unit ID:	K404
Company Equipment ID:	Rapid Reprocess #1
Superseded Permit Number:	P0115736
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K405
Company Equipment ID:	Rapid Reprocess #2
Superseded Permit Number:	P0115736
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



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

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the 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.

7. Best Available Technology

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



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K404 and K405. 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.gov> or by contacting the Toledo Division of Environmental Services.



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Rapid Reprocess 1 and 2: K404,K405,

EU ID	Operations, Property and/or Equipment Description
K404	Automotive off-line repair booth with dry filtration (SPOVEN)
K405	automotive off-line repair booth with dry filtration (SPOVEN)

- 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
Automotive off-line repair booth with dry filtration		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 1/31/2008)	Emissions from the stack associated with the repair booth shall not exceed: 2.4 tons of particulate emissions (PE) per year, 0.62 ton of particulate matter equal to or less than 10 microns in diameter (PM10) per year, 14.5 tons of volatile organic compounds (VOC) per year, 5% opacity as a 6-minute average, and see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 thru 20 (PTI 04-01358 as issued 1/31/2008 and PTI 04-1359 as issued 9/2/2004)	Emissions from the stack associated with the repair booth shall not exceed: 0.551 pound PE per hour, 0.0015 grain of PM10 per dry standard cubic foot (gr/dscf), and see b)(2)c. and b)(2)d.
c.	OAC rules 3745-31-21 thru 27 (PTI 04-01358 as issued 1/31/2008)	See b)(2)e. through b)(2)g.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)h.
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)	Emissions from the stack associated with the clean shop repair station shall not exceed 4.8 pounds of VOC per gallon as



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		a daily volume weighted average of coating, excluding water and exempt solvents.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	See b)(2)i.
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)j. [63.3091(a) and (b)]
Sanding station(s)		
r.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 1/31/2008 and PTI 04-01359 as issued 9/2/2004)	Emissions from the stack(s) associated with the sanding station(s) shall not exceed: 2.4 tons of PE per year, 1.85 tons of PM10 per year, 5% opacity as a 6 minute average, and see b)(2)k. and b)(2)l.
s.	OAC rule 3745-31-10 thru 20 (PTI 04-01359 as issued 9/2/2004)	Emissions from the stack(s) associated with the sanding station(s) shall not exceed: 0.0015 gr/dscf of PM10; and see b)(2)b. through b)(2)d.
t.	OAC rule 3745-17-07(A)(1)	See b)(2)g.
u.	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 rules 3745-31-10 thru 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. 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.



- d. The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 23.14 tons of PM10 per rolling, 12-month period.

The annual PM10 emissions limitation represents the controlled potential to emit of K404 and K405 (0.62 ton of PM10 per year each) added to the controlled potential to emit of K303. Therefore, provided that the controlled hourly potential to emit for K303 are satisfied, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

- e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d).
- f. The combined emissions from the operation of emissions units K404 and K405 shall not exceed 15.0 tons of VOC per rolling, 12-month period.
- g. The maximum combined coating usage in this emissions units K404 and K405 shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$15.0 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

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.

- 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. 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 63.3161;



Or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, 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 63.3171.

- k. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1) and OAC rules 3745-31-10 thru 20.
- l. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).

c) Operational Restrictions

- (1) All of the operations comprising this emissions unit shall be fully enclosed and all emissions shall be exhausted through a dry filtration system.
- (2) The permittee shall operate the dry filtration system whenever the respective emission source is in operation and shall maintain the dry particulate filter.
- (3) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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.
- (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. This election shall be made by advance notification to the Director and shall remain in effect on a calendar month basis.
- (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 the coating line:
 - 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.



- (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:
- the name and identification number of each coating, as applied;
 - the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - 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 CVOC,2.
- (5) For purposes of compliance with the annual VOC emissions limitation for coating usage in this emissions units (14.5 tons), the permittee shall collect and record on a monthly basis the following information:
- the company identification for each coating utilized;
 - the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;
 - the maximum VOC content (excluding water and exempt solvents) of each coating applied; or the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for CVOC,2 above;
 - the total VOC emissions from all coatings applied, i.e., the summation of the products of "b" times "c" for all the individual coatings applied during the month; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., "b" times "c" for worst case coating;
 - the calendar year 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.

- (6) For purposes of compliance with the annual maximum coating utilization in emissions units K404 and K405, the permittee shall collect and record on a monthly basis the following information:
- the company identification for each coating utilized;
 - the volume of each coating applied during the month, Q_i , in gallons;
 - the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon;
 - 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.

Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

- (7) The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months of operation after issuance of this permit
- (8) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

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.
- (2) The permittee shall submit advance notification of the election 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.
- (3) When compliance 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.
- (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 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.
- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the emissions unit exceeds the annual VOC emissions limitation for all coatings employed (14.5 tons per year).
- (6) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization in emissions units K404 and K405 exceeds the applicable limitation, i.e., $(\sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 15.0$ tons, in any rolling, 12-month period.
- (7) The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (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.



(9) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

f) Testing Requirements

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

a. Emission Limitation:

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, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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/hour)

M = maximum coating solids usage rate (pounds/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 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

2.4 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.551 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

f. Emission Limitation:

0.0015 gr/dscf PM10

Applicable Compliance Method:

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



g. Emission Limitation:

0.62 ton of PM10 per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for this emissions unit, as follows:

$(1-98\% \text{ overall control efficiency})[(0.096 \text{ pound PM10 per station-hour from sanding})(2 \text{ stations})(8760 \text{ hours/year}) + (7700 \text{ gallons per year})(15.0 \text{ pounds per gallon})(80\% \text{ solids content})(1-35\% \text{ transfer efficiency})] \div 2000 \text{ pounds per ton} = 0.62 \text{ ton of PM10 per year}$

If required, the permittee shall establish a site specific emission factor, 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, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

h. Emission Limitation:

4.8 pounds of VOC per gallon 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.

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

i. Emission Limitation:

14.5 tons of VOC per year

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.



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 63.3161. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

k. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kg/liter (1.10 lb/gal) 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 63.3171. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

(2) Compliance with the combined emission limitation(s) for this emissions unit shall be determined in accordance with the following method(s):

a. Emission Limitation:

The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 23.14 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by a one-time calculation based on a worst case operating scenario adding 0.62 ton of PM10 per rolling, 12-month period each for K404 and K405 to the K303 hourly emission rate (5 pounds per hour) multiplied by 8760 hours per year, and divided by 2000 pounds per ton

If required, the permittee shall establish compliance through emission testing of K303 for the exhaust gas particulate concentration and the combined exhaust gas flow rate, performed 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.



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0116662
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

b. Emission Limitation:

The combined emissions from the operation of the non-combustion sources of emissions units K404 and K405 shall not exceed 15.0 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d).

g) Miscellaneous Requirements

(1) None.