



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

5/22/2014

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0448010414  
 Permit Number: P0116757  
 Permit Type: Administrative Modification  
 County: Lucas

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

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](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 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 - Toledo North Assembly

Issue Date: 5/22/2014  
Permit Number: P0116757  
Permit Type: Administrative Modification  
Permit Description: Administrative modification to remove the requirements for 40 CFR Part 63 Subpart DDDDD since it has been determined that this MACT is not applicable to this emissions unit (the process heater is part of an affected source subject to 40 CFR Part 63 Subpart IIII).  
Facility ID: 0448010414  
Facility Location: Chrysler Group LLC - Toledo North Assembly  
4400 Chrysler Drive,  
Toledo, OH 43608-4000  
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





**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Chrysler Group LLC - Toledo North Assembly

Facility ID:	0448010414
Permit Number:	P0116757
Permit Type:	Administrative Modification
Issued:	5/22/2014
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Chrysler Group LLC - Toledo North Assembly

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**Draft Permit-to-Install**  
Chrysler Group LLC - Toledo North Assembly  
**Permit Number:** P0116757  
**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): M0002757  
Permit Number: P0116757  
Permit Description: Administrative modification to remove the requirements for 40 CFR Part 63 Subpart DDDDD since it has been determined that this MACT is not applicable to this emissions unit (the process heater is part of an affected source subject to 40 CFR Part 63 Subpart IIII).  
Permit Type: Administrative Modification  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 5/22/2014  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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 - Toledo North Assembly  
**Permit Number:** P0116757  
**Facility ID:** 0448010414  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

**Permit Number:** P0116757  
**Permit Description:** Administrative modification to remove the requirements for 40 CFR Part 63 Subpart DDDDD since it has been determined that this MACT is not applicable to this emissions unit (the process heater is part of an affected source subject to 40 CFR Part 63 Subpart IIII).

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

<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	Sealers and Adhesives
Superseded Permit Number:	P0110267
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
Chrysler Group LLC - Toledo North Assembly  
**Permit Number:** P0116757  
**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.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 - Toledo North Assembly  
**Permit Number:** P0116757  
**Facility ID:** 0448010414  
**Effective Date:** To be entered upon final issuance



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Chrysler Group LLC - Toledo North Assembly  
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## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: P008. 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.
3. 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 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>
<b>Expansion Project Totals</b>			39.03



**Draft Permit-to-Install**  
Chrysler Group LLC - Toledo North Assembly  
**Permit Number:** P0116757  
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## **C. Emissions Unit Terms and Conditions**



**1. 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)	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)	the emissions of VOC from sealants and adhesives shall not exceed 55.06 tons 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 (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 63.3091(c) 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.  see b)(2)e.
<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	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  see b)(2)f. and b)(2)g.
h.	OAC 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	see b)(2)h.
i.	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
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)i.

(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:

$SA_i$  = usage of sealer and/or adhesive material  $i$ , gallons

$VOC_i$  = 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.
- e. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII upon the date of startup of this affected source after modification.
- f. 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.



g. 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.

h. 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 (NOx), 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 the natural gas gel oven stack of this air contaminant source since the uncontrolled potential to emit for CO, NOx, PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

i. 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.

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.

- (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.

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

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.

- (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.

- (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.

- (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<sub>2</sub>.
- (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.

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

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) The permittee shall notify the Director (the Toledo Division of Environmental Services) 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.



- (3) The permittee shall notify the Director (the Toledo Division of Environmental Services) 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.
  - (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.
  - (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.
  - (6) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
  - (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.
  - (8) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).
- 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 63.3151.
- (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 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 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 NOx 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 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 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 NOx 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 NOx 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 201 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.

I. 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 201 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 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 emissions limitation of 0.0075 pound of PM2.5 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.

g) Miscellaneous Requirements

(1) None.