



6/25/2014

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0448010414
 Permit Number: P0116733
 Permit Type: Administrative Modification
 County: Lucas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	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:

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

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

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada



Response to Comments

Facility ID:	0448010414
Facility Name:	Chrysler Group LLC - Toledo North Assembly
Facility Description:	Automotive and Light Duty Truck Assembly Plant.
Facility Address:	4400 Chrysler Drive Toledo, OH 43608-4000 Lucas County
Permit:	P0116733, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 05/24/2014. The comment period ended on 06/23/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

- a. Comment: None
- b. Response: None



FINAL

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

Facility ID: 0448010414
Permit Number: P0116733
Permit Type: Administrative Modification
Issued: 6/25/2014
Effective: 6/25/2014



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

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Authorization

Facility ID: 0448010414
Facility Description: Automotive and Light Duty Truck Assembly Plant.
Application Number(s): M0002754
Permit Number: P0116733
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 these emissions units (the process heaters are part of an affected source subject to 40 CFR Part 63 Subpart IIII).
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 6/25/2014
Effective Date: 6/25/2014

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.

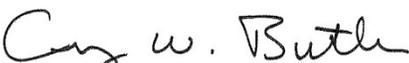
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Authorization (continued)

Permit Number: P0116733
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 these emissions units (the process heaters are 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:

Emissions Unit ID:	K021
Company Equipment ID:	E-Coat
Superseded Permit Number:	P0115997
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K022
Company Equipment ID:	Powder Anti-chip
Superseded Permit Number:	P0115997
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K023
Company Equipment ID:	Topcoat
Superseded Permit Number:	P0115997
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Chrysler Group LLC - Toledo North Assembly
Permit Number: P0116733
Facility ID: 0448010414
Effective Date:6/25/2014

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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.



Final Permit-to-Install
Chrysler Group LLC - Toledo North Assembly
Permit Number: P0116733
Facility ID: 0448010414
Effective Date: 6/25/2014

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 60, Subpart MM: K021, K022 and K023. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.
3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K021, K022, and K023. 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.
5. 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
New & Modified Sources at PTE*			
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
Emissions from Associated Units**	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
Subtotals	470.21	586.58	116.37
Excludable Emissions			<77.34>
Expansion Project Totals			39.03



C. Emissions Unit Terms and Conditions



1. K021, E-Coat

Operations, Property and/or Equipment Description:

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

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Electrodeposition (E-Coat) prime coat of automobile bodies with regenerative thermal oxidizer (RTO) on the oven exhaust		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-1102 issued 10/27/99)	visible particulate emissions from the RTO stack shall not exceed 5% opacity as a 6-minute average see b)(2)a.
b.	OAC rules 3745-31-10 through 20 (PTI 04-1102 issued 10/27/99)	emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 0.23 pound per gallon of applied coating solids as a monthly volume weighted average emissions of VOC from this emissions unit shall not exceed 52.01 tons during any rolling, 12-month period see b)(2)b. and b)(2)c.
c.	OAC rule 3745-21-09(C)(1)(a)(i)	VOC content of the coatings in the E-Coat operations tank shall not exceed 1.4 pounds per gallon of coating solids.
d.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)d.



e.	40 CFR Part 60, Subpart MM (60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant prime coat operation subject to the emission limitations/control measures specified in this section.	see b)(2)e.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)f.
g.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)g. [63.3091(a) and (b)]
35.0 mmBtu per hour indirect fired, natural gas drying oven combustion emissions		
h.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01)	the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed: 0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input; 0.30 ton of PE per rolling, 12-month period; 0.0075 pound of particulate emissions of 10 microns or less in diameter (PM10) per mmBtu of actual heat input; 1.15 tons of PM10 per rolling, 12-month period; 0.0075 pound of particulate emissions of 2.5 microns or less in diameter (PM10) per mmBtu of actual heat input; 1.15 tons of PM2.5 per rolling, 12-month period; 0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input; 0.10 ton of SO2 per rolling, 12-month period; 0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input; 0.83 ton of VOC per rolling, 12-month period; and 5% opacity as a 6-minute average see b)(2)h. and b)(2)i.



i.	ORC 3704.03(T)	the emissions from the oven combustion stack(s) shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and 0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input. see b)(2)h.
j.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)j.
k.	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
l.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input
m.	OAC rule 3745-18-06(A)	see b)(2)k.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM.
- b. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations.
- c. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- d. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
- f. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 2 of Subpart IIII.
- g. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding



primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

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.

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

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO₂), and volatile organic compound (VOC) emissions from this air contaminant source since the



uncontrolled potential to emit for PE, PM₁₀, PM_{2.5}, SO₂, and VOC is less than 10 tons per year.

- k. 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 60, Subpart MM (60.390 through 60.398).

- (4) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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 OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-21-10(B)(8), the permittee, having chosen to demonstrate compliance through the use of



compliant coatings, shall collect and record the following information each month for the e-coat operation:

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

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

where:

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

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

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

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

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

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

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

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

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

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

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

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



- (4) For purposes of compliance with OAC rules 3745-31-10 through 20, the permittee shall collect and record the following information for each month for the coating line and control equipment:
 - a. the name and identification number of each coating used;
 - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (mass of VOC per volume of applied coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per volume of coating solids, as applied) of all the coatings;
 - d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - e. the calculated, controlled VOC emissions, in tons of VOC per month and tons of VOC per rolling, 12-month period. The controlled VOC emissions shall be calculated using the controlled VOC emission rate in d. above, the volume solids content per month from b. above and a factor of 2,000 pounds/ton;
 - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was greater than 50 Fahrenheit degrees below the average temperature determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
- (5) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (6) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
 - (2) For purposes of compliance with OAC rule 3745-21-09(B)(3)(g), the permittee shall notify the director (the Toledo Division of Environmental Services) of any monthly record showing the use of non-complying coatings. A copy of such record shall be sent to the director (the Toledo Division of Environmental Services) within thirty days after the exceedance occurs.
 - (3) The permittee shall submit quarterly reports to the Director (Toledo Division of Environmental Services) identifying all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was greater than 50 Fahrenheit degrees below the average temperature



during the most recent emission test that demonstrated that the emissions unit was in compliance. If no such periods of deviation occur, the permittee shall submit a negative report.

- (4) For purposes of compliance with OAC rules 3745-31-10 through 20, the permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled VOC emission rate exceeds the applicable mass of VOC per volume of applied coating solids limitation. The notification shall include a copy of such record.
 - (5) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled rolling 12-month VOC emission rate exceeds the applicable mass emission limitation. The notification shall include a copy of such record.
 - (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 60, Subpart MM (60.390 through 60.398).
 - (9) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- 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:
 - 5% opacity as a 6-minute average from the RTO stack.
 - 5% opacity as a 6-minute average from each oven combustion stack.
 - 20% opacity as a 6-minute average from each oven combustion stack.Applicable Compliance Method:

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



Applicable Compliance Method:

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

d. Emission Limitation:

0.23 pound of VOC per gallon of applied coating solids.

Applicable Compliance Method:

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

e. Emission Limitation:

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

Applicable Compliance Method:

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

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

0.17 kilogram of VOC per liter of applied coating solids or

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

Applicable Compliance Method:

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



g. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161.

h. 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.

i. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.

Applicable Compliance Method:

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

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

j. Emission Limitation:

0.100 pound of NOx per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NOx per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.



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

k. Emission Limitation:

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

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

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

l. Emission Limitation:

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

Applicable Compliance Method:

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

m. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 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.

n. Emission Limitation:

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

Applicable Compliance Method:

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

o. Emission Limitation:

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

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 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.

p. Emission Limitation:

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

Applicable Compliance Method:

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

q. Emission Limitation:

0.0006 pound of SO₂/mmBtu actual heat input.



Applicable Compliance Method:

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

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

r. Emission Limitation:

0.10 ton of SO₂ per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO₂ per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

s. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

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

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

t. Emission Limitation:

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



Applicable Compliance Method:

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

g) Miscellaneous Requirements

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



2. K022, Powder Anti-chip

Operations, Property and/or Equipment Description:

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

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) g)(1).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Electrostatic powder anti-chip guidecoat operation		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-1102 issued 10/27/99)	the emissions of volatile organic compounds (VOC) from the guidecoat shall not exceed 3.25 tons during any rolling, 12-month period see b)(2)a.
b.	OAC rules 3745-31-10 through 20 (PTI 04-1102 issued 10/27/99)	the requirements established pursuant to this rule are equivalent to the requirements of 40 CFR Part 60, Subpart MM see b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)c.
e.	OAC rule 3745-21-09(C)(1)(b)	1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents on a daily basis see b)(2)d.
f.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)e.
g.	40 CFR Part 60, Subpart MM (60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant guide coat operation subject to the emission	in accordance with 60.392(b), the emissions of VOC from this emissions unit shall not exceed 1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	limitations/control measures specified in this section.	
h	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)f.
i.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)g. [63.3091(a) and (b)]
41.8 mmBtu per hour natural gas curing oven combustion emissions		
j.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01)	the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed: 0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input; 0.35 ton of PE per rolling, 12-month period; 0.0075 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per mmBtu of actual heat input; 1.38 tons of PM10 per rolling, 12-month period; 0.0075 pound of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per mmBtu of actual heat input; 1.38 tons of PM2.5 per rolling, 12-month period; 0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input; 0.11 ton of SO2 per rolling, 12-month period; 0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input; 0.99 ton of VOC per rolling, 12-month period; and 5% opacity as a 6-minute average from each oven combustion stack. see b)(2)h. and b)(2)i.
k.	ORC 3704.03(T)	the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and 0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see b)(2)h.
i.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)j.
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
m.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input
n.	OAC rule 3745-18-06(A)	see b)(2)k.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(a)(v) and 40 CFR Part 60, Subpart MM.
- b. The permittee shall employ only low VOC powder as a coating material in this emissions unit.
- c. The permittee shall employ reasonably available control measures on the powder guidecoat operations associated with this emissions unit for the purpose of ensuring compliance with the applicable requirements. The permittee has committed to utilize inherent fabric filtration and adequate enclosure to minimize or eliminate visible particulate emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. Implementation of these control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B), (B)(3).
- d. The permittee shall utilize only compliant coatings, not exceeding 1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, in this emissions unit.
- e. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- f. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 2 of Subpart IIII.
- g. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;



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.

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

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO2), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

- k. 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 60, Subpart MM (60.390 through 60.398).

- (4) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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 units.

- (2) The permittee, having chosen to demonstrate compliance through the use of compliant coatings (i.e., only low VOC powder coatings shall be utilized as a coating material and each powder shall comply with the applicable emission limitation as applied), shall collect and record the following information for each month for the coating line:

- a. the name and identification number of each coating, as applied;
- b. the mass of VOC emitted per volume of coating solids of each coating, as applied.
- c. the applied volume of coating solids of each coating;



- d. the monthly emissions of VOC (the summation of b. x c. for all coatings) and the rolling, 12-month summation of the monthly emissions, in tons per year.

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

- (3) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (4) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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.
- (2) The permittee shall notify the Director (Toledo Division of Environmental Services) of any daily record showing that the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environmental Services) within thirty days following the end of the calendar month.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.
- (4) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (6) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (7) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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:

- 5% opacity as a 6-minute average from each oven combustion stack, and
- 20% opacity as a 6-minute average from each oven combustion stack.

Applicable Compliance Method:

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



9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

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

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(5)d.

e. Emission Limitation:

1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(2)b. using the procedures in OAC rule 3745-21-09(B)(3)(f) for determining the monthly volume-weighted average mass of VOC emitted per volume of coatings.



- f. Emission Limitation in accordance with 40 CFR Part 60, Subpart MM:
- 1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis.
- Applicable Compliance Method:
- The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.
- g. Emission Limitation:
- combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.
- Applicable Compliance Method:
- Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161.
- h. 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.
- i. Emission Limitation:
- 0.083 pound of CO per mmBtu actual heat input.
- Applicable Compliance Method:
- This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.
- If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



j. Emission Limitation:

0.100 pound of NO_x per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NO_x per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

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

k. Emission Limitation:

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

Applicable Compliance Method:

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

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

l. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0019 pound PE per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

m. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu of actual heat input.



Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 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.

n. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

o. Emission Limitation:

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

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 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.

p. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations



performed as follows: multiply the technical emission limitation (0.0075 pound PM_{2.5} per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

q. Emission Limitation:

0.0006 pound of SO₂/mmBtu actual heat input.

Applicable Compliance Method:

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

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

r. Emission Limitation:

0.11 ton of SO₂ per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO₂ per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

s. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC



rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

t. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

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



3. K023, Topcoat

Operations, Property and/or Equipment Description:

Topcoat with 2 natural gas infrared flash tunnels and 2 indirect fired drying ovens with a combined actual heat input capacity of 50.4 mmBtu per hour

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	two automotive topcoat booths with waterwash filtration, using waterborne basecoat and solvent-borne clearcoat, with control by regenerative thermal oxidizer (RTO) on the two clearcoat drying ovens	
a.	OAC rule 3745-31-05(A)(3) (PTI 04-1102 issued 10/27/99)	the emissions from this emissions unit shall not exceed 68.46 tons of particulate matter equal to 10 microns or less in diameter (PM10) as a rolling, 12-month summation visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a 6-minute average see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(D)	the particulate emissions (as PM10) from this emissions unit shall not exceed 15.63 pounds per hour
c.	OAC rules 3745-31-10 through 20 (PTI 04-1102 issued 10/27/99)	8.63 pounds of volatile organic compounds (VOC) per gallon of applied coating solids on a monthly basis, and 768.68 tons of VOC as a rolling, 12-month summation see b)(2)b. through b)(2)d.
d.	OAC rule 3745-17-07(A)(1)	see b)(2)e.
e.	OAC rule 3745-17-11(C)(3)	exemption from work practice requirements
f.	OAC rule 3745-21-09(C)(1)(c)	emissions of VOC from this emissions unit shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids on a



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		daily basis
g.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)f.
h.	40 CFR Part 60, Subpart MM (60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant topcoat coat operation subject to the emission limitations/control measures specified in this section.	see b)(2)g.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)h.
j.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)i. [63.3091(a)]
two natural gas infrared flash tunnels and two indirect fired, drying ovens with a combined heat input capacity of 50.4 mmBtu per hour; combustion emissions		
k.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01)	the combined emissions from the oven combustion stacks serving this emissions unit shall not exceed: 0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input; 0.42 ton of PE per rolling, 12-month period; 0.0075 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per mmBtu of actual heat input; 1.66 tons of PM10 per rolling, 12-month period; 0.0075 pound of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per mmBtu of actual heat input; 1.66 tons of PM2.5 per rolling, 12-month period; 0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input; 0.14 ton of SO2 per rolling, 12-month period; 0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input;



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.20 tons of VOC per rolling, 12-month period; and 5% opacity as a 6-minute average from each oven combustion stack. see b)(2)j. and b)(2)k.
I.	ORC 3704.03(T)	the combined emissions from the combustion stacks serving this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and 0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input. see b)(2)j.
m.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)l.
m.	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
n.	OAC rule 3745-17-10(B)(1)	particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input
o.	OAC rule 3745-18-06(A)	see b)(2)m.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20.
- b. The permittee shall control the particulate emissions (as PM10) from the coating operations of this emissions unit with a waterwash particulate filter, or equivalent.
- c. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations.
- d. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



- f. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
- h. Table 2 to Subpart III of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- i. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

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.

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



approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- I. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO₂), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO₂, and VOC is less than 10 tons per year.

- m. OAC rule 3745-18-06(A) does not establish SO₂ emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

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

c) Operational Restrictions

- (1) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation.

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

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

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



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

- (4) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (5) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain records that document any time periods when the waterwash system was not in service when the emissions unit was in operation
- (2) The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) Pursuant to OAC 3745-21-09(C)(4), the permittee shall maintain daily records for the topcoat process that will enable the permittee to calculate the VOC emission rate in order to demonstrate compliance with the emissions limitation identified in OAC rule 3745-21-09(C)(1)(c) for the topcoat process in accordance with the USEPA's Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Truck Topcoat Operations (EPA-45-/3-88-028, Dec. 1988) and any subsequent revisions thereof. The permittee shall calculate and record the VOC emission rates for the topcoat operation in pounds of VOC per gallon of coating, excluding water and exempt solvents, or in pounds of VOC per gallon of deposited solids on a daily basis, using the overall capture and control efficiency for the control



equipment, as determined during the most recent emissions test that demonstrated the emission unit was in compliance.

- (4) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the firebox of the thermal incinerator when the incinerator is in operation. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications, with any modifications deemed necessary by the permittee and approved by the Toledo Division of Environmental Services. The device shall have an accuracy of the greater of 0.75 percent of the temperature being measured expressed in degrees Celsius or 4.0 Fahrenheit degrees. Each temperature measurement device shall be equipped with a recording device so that a permanent record is produced. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.
- (5) The permittee shall collect and record the following information for each month for the coating line and control equipment to demonstrate compliance with the VOC limitations of OAC rule 3745-31-10 through 20:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the monthly volume-weighted average VOC content (in mass of VOC per volume of applied coating solids) of all the coatings;
 - d. the calculated, controlled VOC emission rate, in mass of VOC per volume of applied coating solids. The controlled VOC emission rate shall be calculated using the daily volume-weighted VOC content and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - e. the calculated, controlled VOC emissions, in tons of VOC per month and tons of VOC per rolling, 12-month period.
 - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was greater than 50 Fahrenheit degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

For purposes of compliance with the requirements of OAC rule 3745-31-10 through 20, alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

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



- (7) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).
- (8) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify any daily record showing that the water wash system was not in service when the emissions unit was in operation.
- (2) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (3) The permittee shall notify the Director (Toledo Division of Environmental Services) of any daily record indicating that the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating, excluding water and exempt solvents, or pounds of VOC per gallon of deposited solids on a daily basis exceeded the emissions limitation specified in OAC rule 3745-21-09(C)(1)(c). The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environmental Services) within thirty days following the end of the calendar month.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was greater than 50 Fahrenheit degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. If no such periods of deviation occur, the permittee shall submit a negative report.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the monthly pounds of VOC per gallon of applied coating solids exceeds the applicable limitation. The notification shall include a copy of such record.
- (6) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.
- (7) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (8) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



- (9) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (10) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).
 - (11) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- 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:

5% opacity as a 6-minute average.

20% opacity as a 6-minute average.

Applicable Compliance Method:

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

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

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

15.63 pounds of PM10 per hour from the paint booth and curing oven (RTO) stacks.

Applicable Compliance Method:

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



d. Emission Limitation:

68.46 tons of PM10 as a rolling, 12-month summation.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the short term emission limitation (15.63 pounds of PM10 per hour), by the maximum annual hours of operation (8,760 hours) and then divide by 2,000 pounds per ton.

e. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids on a daily basis.

Applicable Compliance Method:

Compliance shall be demonstrated pursuant to the methods and procedures set forth in the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", EPA-450-3-88-018, dated December 1988, and any subsequent revision approved by the USEPA and the State of Ohio Environmental Protection Agency, as provided in OAC rule 3745-21-09(C)(4).

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

1.47 kilograms of VOC per liter (12.3 pounds of VOC per gallon) of applied coating solids on a monthly basis.

Applicable Compliance Method:

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

g. Emission Limitation:

8.63 pounds of VOC per gallon of applied coating solids on a monthly basis.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



h. Emission Limitation:

768.68 tons of volatile organic compounds (VOC) as a rolling, 12-month summation.

Applicable Compliance Method:

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

i. Emission Limitation:

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

Applicable Compliance Method:

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

j. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161.

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.

l. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.



Applicable Compliance Method:

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

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

m. Emission Limitation:

0.100 pound of NO_x per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NO_x per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

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

n. Emission Limitation:

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

Applicable Compliance Method:

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

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



o. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0019 pound of PE per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

p. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 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.

q. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

r. Emission Limitation:

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

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution



Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM_{2.5} per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 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.

s. Emission Limitation:

1.66 tons of PM_{2.5} per rolling, 12-month period..

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM_{2.5} per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

t. Emission Limitation:

0.0006 pound of SO₂/mmBtu actual heat input.

Applicable Compliance Method:

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

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

u. Emission Limitation:

0.14 ton of SO₂ per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO₂ per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour),



and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

v. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

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

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

w. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

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