



11/18/2014

Certified Mail

Mr. Matthew Mesaros  
Ford Motor Company - Ohio Assembly Plant  
650 Miller Road  
Avon Lake, OH 44012

Facility ID: 0247030471  
Permit Number: P0085256  
County: Lorain

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Erica R. Engel-Ishida, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
Ohio EPA-NEDO



PUBLIC NOTICE  
11/18/2014 Issuance of Draft Air Pollution Title V Permit

Ford Motor Company - Ohio Assembly Plant  
650 Miller Road,  
Avon Lake, OH 44012-0000  
Lorain County  
FACILITY DESC.: Automobile Manufacturing  
PERMIT #: P0085256  
PERMIT TYPE: Renewal  
PERMIT DESC: Title V renewal permit incorporating Plantwide Applicability Limit permit provisions

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kristen Switzer, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171





## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0247030471
Facility Name:	Ford Motor Company - Ohio Assembly Plant
Facility Description:	Automobile and light truck assembly plant
Facility Address:	650 Miller Road, Avon Lake, OH 44012-0000
Permit #:	P0085256, Renewal

This facility is subject to Title V because it is major for:

- Lead   
  Sulfur Dioxide   
  Carbon Monoxide   
 x Volatile Organic Compounds   
  Nitrogen Oxides  
 Particulate Matter ≤ 10 microns   
 x Single Hazardous Air Pollutantx Combined Hazardous Air Pollutants  
 x Maximum Available Control Technology Standard(s)   
 GHG   
 Title IV

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	All emissions units: A Plantwide Applicability Limit (PAL) permit (PTI P0104237) was issued for this facility on 10/24/13 for VOC, PM2.5, PM/PM10, NOx, CO, SO2, and greenhouse gas (GHG).
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	K007, K013, K014, K015, K016, and K017: VOC

**B. Facility-Wide Terms and Conditions**

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	



**C. Emissions Unit Terms and Conditions**

**Key:**  
 EU = emissions unit ID  
 ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)  
 OR = operational restriction  
 M = monitoring requirements  
 ENF = did noncompliance issues drive the monitoring requirements?  
 R = record keeping requirements  
 Rp = reporting requirements  
 ET = emission testing requirements (not including compliance method terms)  
 St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement  
 Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
B004	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
B004	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	Y	N	N	
B004	0.020 lb PE/mmBtu	17-10(B)(1)	N	N	N	Y	N	Y	Y	Y	N	N	
B004	No rule limit	18-06(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: There is no emission limit from the rule. Therefore, there are no requirements under these categories.
B004	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
B004	Compliance with all applicable sections of rule	N	40 CFR Part 63, Subpart DDDDD	N	Y	Y	N	Y	Y	Y	N	N	
B004	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
B010	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
B010	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	Y	N	N	
B010	0.020	17-10(B)(1)	N	N	N	Y	N	Y	Y	Y	N	N	



	lbPE/mmBtu												
B010	No rule limit	18-06(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: There is no emission limit from the rule. Therefore, there are no requirements under these categories.
B010	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
B010	Exempt	N	40 CFR Part 63, Subpart DDDDD	Y	N	N	N	N	N	N	N	N	
B015	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
B015	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	Y	N	N	
B015	0.020 lb PE/mmBtu	17-10(B)(1)	N	N	N	Y	N	Y	Y	Y	N	N	
B015	No rule limit	18-06(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: There is no emission limit from the rule. Therefore, there are no requirements under these categories.
B015	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
B015	24.9 tons NOx/year	31-05(D)(1)(a)	N	N	Y	Y	N	Y	Y	Y	N	N	
B015	See limitations in associated EU K017 terms	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
B015	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
B027	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
B027	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	Y	N	N	



B027	0.020 lb PE/mmBtu	17-10(B)(1)	N	N	N	Y	N	Y	Y	Y	N	N	
B027	No rule limit	18-06(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: There is no emission limit from the rule. Therefore, there are no requirements under these categories.
B027	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
B027	See limitations in associated EU K017 terms	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
B027	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
K007	0.17 kg VOC/L applied coating solids when solids $R_T \geq 0.16$ , $0.17 \times 350^{(0.160 - R_T)}$ kg VOC/L applied coating solids when $0.040 \leq R_T < 0.160$ , no limit when $R_T < 0.040$	N	40 CFR Part 60, Subpart MM										
K007	0.70 lb VOC/gal solids when solids $R_T \geq 0.16$ , $0.70 \times 350^{(0.160 - R_T)}$ lbs VOC/gal solids when $0.040 \leq R_T < 0.160$ , no limit when $R_T < 0.040$	21-29(C)(1)(a)	N	N	N	Y	N	Y	Y	Y	N	N	
K007	Compliance with all other	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	



	applicable rules												
K007	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K007	0.072 kg HAPs/L (0.60 lb HAPs/gal) of coating solids deposited each month or < 1.0 % wt. HAP and 0.10 % by wt. HAP which is an OSHA-defined carcinogen or bake oven emissions captured and ducted to control device w/DRE of at least 95 % and other coating operation(s) < 0.132 kg HAPs/L (1.10 lb HAPs/gal) of coating solids deposited each month	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
K007	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
K007	CAM program	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	EU controlled by regenerative thermal oxidizer (RTO): continuously monitor temperature, testing for VOC capture and destruction efficiency per EPA/Auto Protocol
K021	4.8 lbs VOC/gallon coating	21-29(C)(1)(f)	N	N	N	Y	N	Y	Y	Y	N	N	



K021	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
K021	Work practice standards	17-11(C)	N	N	Y	Y	N	Y	Y	N	N	N	
K021	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K021	0.072 kg HAPs/L (0.60 lb HAPs/gal) of coating solids deposited each month or < 1.0 % wt. HAP and 0.10 % by wt. HAP which is an OSHA-defined carcinogen or bake oven emissions captured and ducted to control device w/DRE of at least 95 % and other coating operation(s) < 0.132 kg HAPs/L (1.10 lb HAPs/gal) of coating solids deposited each month	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
K021	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
K023	Compliance with all other	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	



	applicable rules												
K023	7.5 lbs VOC/gallon from glass bonding primer	21-29(C)(2)(a)	N	N	N	Y	N	Y	Y	Y	N	N	
K023	2.1 lbs VOC/gallon from adhesive	21-29(C)(2)(b)	N	N	N	Y	N	Y	Y	Y	N	N	
K023	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K023	0.072 kg HAPs/L (0.60 lb HAPs/gal) of coating solids deposited each month or < 1.0 % wt. HAP and 0.10 % by wt. HAP which is an OSHA-defined carcinogen or bake oven emissions captured and ducted to control device w/DRE of at least 95 % and other coating operation(s) < 0.132 kg HAPs/L (1.10 lb HAPs/gal) of coating solids deposited each month	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
K023	General Provisions	N	40 CFR Part 63, Subpart	N	Y	Y	N	Y	Y	Y	N	N	



			A										
K024	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
K024	3.5 lbs VOC/gallon from antichip materials	21-09(U)(1)(c)	N	N	N	Y	N	Y	Y	Y	N	N	
K024	Equivalent to 21-09(U)(1)(c)	21-09(U)(3)	N	N	N	Y	N	Y	Y	Y	N	N	
K024	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K024	5.4 lbs VOC/gallon from sealer	21-29(C)(2)(d)	N	N	N	Y	N	Y	Y	Y	N	N	
K024	5.4 lbs VOC/gallon from deadener	21-29(C)(2)(e)	N	N	N	Y	N	Y	Y	Y	N	N	
K024	5.4 lbs VOC/gallon from underbody coating	21-29(C)(2)(g)	N	N	N	Y	N	Y	Y	Y	N	N	
K024	Average HAP emissions from all adhesive/sealer materials (excluding glass bonding) < 0.010 kg/kg (lb/lb) of adhesive/sealer materials used each month	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
K024	General Provisions	N	40 CFR Part 63, Subpart	N	Y	Y	N	Y	Y	Y	N	N	



			A										
B008, B009, B011, B013, B020, B022, and B025	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
B008, B009, B011, B013, B020, B022, and B025	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	Y	N	N	
B008, B009, B011, B013, B020, B022, and B025	0.020 lb PE/mmBtu	17-10(B)(1)	N	N	N	Y	N	Y	Y	Y	N	N	
B008, B009, B011, B013, B020, B022, and B025	No rule limit	18-06(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: There is no emission limit from the rule. Therefore, there are no requirements under these categories.
B008, B009, B011, B013, B020, B022, and B025	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	



B008, B009, B011, B013, B020, B022, and B025	See limitations in associated EU terms for EUs K013, K014, K015, K016, K018, K013, and K021, respectively	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
B008, B009, B011, B013, B020, B022, and B025	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
B023 and B024	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
B023 and B024	20% opacity	17-07(A)	N	N	N	Y	N	Y	Y	Y	N	N	
B023 and B024	0.020 lb PE/mmBtu	17-10(B)(1)	N	N	N	Y	N	Y	Y	Y	N	N	
B023 and B024	No rule limit	18-06(A)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: There is no emission limit from the rule. Therefore, there are no requirements under these categories.
B023 and B024	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K013 and K014	1.40 Kg VOC/liter applied coating solids or 11.68 lbs VOC/gallon applied solids	N	40 CFR Part 60, Subpart MM	N	N	Y	N	Y	Y	Y	N	N	
K013	12.0	21-29(C)(1)(c)	N	N	N	Y	N	Y	Y	Y	N	N	



and K014	lbsVOC/gallon deposited solids for primer- surfacer coating and primer-surfacer and topcoat coating	and (e)												
K013 and K014	VOC destruction efficiency of 95% or maximum outlet VOC concentration of 25 ppm from regenerative thermal oxidizer (RTO) and compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N		
K013 and K014	Work practice standards	17-11(C)	N	N	Y	Y	N	Y	Y	N	N	N		
K013 and K014	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N		
K013 and K014	0.072 kg HAPs/L (0.60 lb HAPs/gal) of coating solids deposited each month or < 1.0 % wt. HAP and 0.10 % by wt. HAP which is an OSHA-defined carcinogen or bake oven	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N		



	emissions captured and ducted to control device w/DRE of at least 95 % and other coating operation(s) < 0.132 kg HAPs/L (1.10 lb HAPs/gal) of coating solids deposited each month												
K013 and K014	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
K013 and K014	CAM program	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	EU controlled by regenerative thermal oxidizer (RTO); continuously monitor temperature, testing for VOC capture and destruction efficiency per EPA/Auto Protocol
K015, K016, and K017	1.47 Kg VOC/liter applied coating solids or 12.27 lbs VOC/gallon applied solids	N	40 CFR Part 60, Subpart MM	N	N	Y	N	Y	Y	Y	N	N	
K015, K016, and K017	12.0 lbs VOC/gallon deposited solids for topcoat coating and primer-surfacer and topcoat coating	21-29(C)(1)(c) and (e)	N	N	N	Y	N	Y	Y	Y	N	N	
K015, K016, and K017	VOC destruction efficiency of 95% or maximum outlet VOC	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	



	concentration of 25 ppm from regenerative thermal oxidizer (RTO) and compliance with all other applicable rules												
K015, K016, and K017	Work practice standards	17-11(C)	N	N	Y	Y	N	Y	Y	N	N	N	
K015, K016, and K017	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K015, K016, and K017	0.072 kg HAPs/L (0.60 lb HAPs/gal) of coating solids deposited each month or < 1.0 % wt. HAP and 0.10 % by wt. HAP which is an OSHA-defined carcinogen or bake oven emissions captured and ducted to control device w/DRE of at least 95 % and other coating operation(s) < 0.132 kg HAPs/L (1.10 lb HAPs/gal) of coating solids deposited each	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	



	month												
K015, K016, and K017	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
K015, K016, and K017	CAM program	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	EU controlled by VOC concentrator (carbon adsorbers) and regenerative thermal oxidizer (RTO): continuously monitor temperature, testing for VOC capture and destruction efficiency per EPA/Auto Protocol, monitor rotational speed of concentrator
K018 and K019	3.5 lbs VOC/gallon coating	21-09(U)(1)(d)	N	N	N	Y	N	Y	Y	Y	N	N	
K018 and K019	Compliance with all other applicable rules	31-05(A)(3)	N	N	Y	Y	N	Y	Y	Y	N	N	
K018 and K019	Work practice standards	17-11(C)	N	N	Y	Y	N	Y	Y	N	N	N	
K018 and K019	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
K018 and K019	5.4 lbs VOC/gallon from cavity wax	21-29(C)(2)(c)	N	N	N	Y	N	Y	Y	Y	N	N	
K018 and K019	0.072 kg HAPs/L (0.60 lb HAPs/gal) of coating solids deposited each month or < 1.0 % wt. HAP and 0.10 % by wt. HAP which is an OSHA-defined carcinogen or bake oven emissions captured and	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	



	ducted to control device w/DRE of at least 95 % and other coating operation(s) < 0.132 kg HAPs/L (1.10 lb HAPs/gal) of coating solids deposited each month												
K018 and K019	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	
P013 and P100	Compliance with all other applicable rules	31-05(A)(3)	N	N	N	Y	N	Y	Y	Y	N	N	
P013 and P100	Work practice standards	21-29(E)	N	N	Y	N	N	N	N	N	N	N	M, R, Rp, ET: This rule specifies work practices for coating related activities and cleaning materials for coating operations. Therefore, there are no requirements under these categories.
P013 and P100	See B. Facility-Wide T's & C's for limitations	31-32(A)(6)	N	N	Y	Y	N	Y	Y	Y	N	N	
P013 and P100	Work practice standards in rule equivalent to OAC rule 3745-31-05(A)(3)	N	40 CFR Part 63, Subpart IIII	N	Y	Y	N	Y	Y	Y	N	N	
P013 and P100	General Provisions	N	40 CFR Part 63, Subpart A	N	Y	Y	N	Y	Y	Y	N	N	



**DRAFT**

**Division of Air Pollution Control**  
**Title V Permit**  
for  
Ford Motor Company - Ohio Assembly Plant

Facility ID:	0247030471
Permit Number:	P0085256
Permit Type:	Renewal
Issued:	11/18/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Ford Motor Company - Ohio Assembly Plant

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**Draft Title V Permit**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0085256  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0247030471  
Facility Description: Automobile and light truck assembly plant  
Application Number(s): A0015883, A0015884, A0015885, A0015886, A0036662  
Permit Number: P0085256  
Permit Description: Title V renewal permit incorporating Plantwide Applicability Limit permit provisions  
Permit Type: Renewal  
Issue Date: 11/18/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0085254

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

Ford Motor Company - Ohio Assembly Plant  
650 Miller Road  
Avon Lake, OH 44012-0000

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Title V Permit**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0085256  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

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



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

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

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

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

#### **5. Title IV Provisions**

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

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

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

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
  
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

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

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

## **8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

## **9. Marketable Permit Programs**

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

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



**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

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

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

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

**13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.



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

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

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

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

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

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

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

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



## 16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

## 17. Off-Permit Changes

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

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

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

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

## 18. Compliance Method Requirements

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

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



**19. Insignificant Activities or Emissions Levels**

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

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

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

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

**23. Title VI Provisions**

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



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

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

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

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



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

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

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

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

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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



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

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



**Draft Title V Permit**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0085256  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. Establishment of Plantwide Applicability Limitations (PALs)

- a) The facility-wide VOC emission limitation of 1149.2 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 1998 and 1999 of 1097.6 and 1114.1 tons, respectively. Average facility-wide VOC emissions for 1998 and 1999 are 1105.9 tons per year. Due to permits issued since 1998 and 1999 allowing an increase in VOC emissions of 4.29 tons per year, the adjusted baseline actual facility-wide VOC emissions are 1110.2 tons per year. Adding the significance level for VOC emissions of 39 tons per year to the baseline actual facility-wide VOC emissions of 1110.2 gives an allowable VOC emission rate of 1149.2 tons per year.
- b) The facility-wide PM<sub>2.5</sub> emission limitation of 26.32 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM<sub>2.5</sub> emissions from 1999 and 2000 of 17.47 and 15.37 tons, respectively. Average facility-wide PM<sub>2.5</sub> emissions for 1999 and 2000 are 16.42 tons per year. Adding the significance level for PM<sub>2.5</sub> emissions of 9.9 tons per year to the baseline actual facility-wide PM<sub>2.5</sub> emissions of 16.42 gives an allowable PM<sub>2.5</sub> emission rate of 26.32 tons per year.
- c) The facility-wide PM/PM<sub>10</sub> emission limitation of 31.32 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM/PM<sub>10</sub> emissions from 1999 and 2000 of 17.47 and 15.37 tons, respectively. Average facility-wide PM/PM<sub>10</sub> emissions for 1999 and 2000 are 16.42 tons per year. Adding the significance level for PM/PM<sub>10</sub> emissions of 14.9 tons per year to the baseline actual facility-wide PM/PM<sub>10</sub> emissions of 16.42 gives an allowable PM/PM<sub>10</sub> emission rate of 31.32 tons per year.
- d) The facility-wide NO<sub>x</sub> emission limitation of 124.27 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NO<sub>x</sub> emissions from 2004 and 2005 of 75.46 and 95.08 tons, respectively. Average facility-wide NO<sub>x</sub> emissions for 2004 and 2005 are 85.27 tons per year. Adding the significance level for NO<sub>x</sub> emissions of 39 tons per year to the baseline actual facility-wide NO<sub>x</sub> emissions of 85.27 gives an allowable NO<sub>x</sub> emission rate of 124.27 tons per year.
- e) The facility-wide CO emission limitation of 255.36 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2004 and 2005 of 138.34 and 174.37 tons, respectively. Average facility-wide CO emissions for 2004 and 2005 are 156.36 tons per year. Adding the significance level for CO emissions of 99 tons per year to the baseline actual facility-wide CO emissions of 156.36 gives an allowable CO emission rate of 255.36 tons per year.
- f) The facility-wide SO<sub>2</sub> emission limitation of 40.33 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SO<sub>2</sub> emissions from 2004 and 2005 of 1.2 and 1.46 tons, respectively. Average facility-wide SO<sub>2</sub> emissions for 2004 and 2005 are 1.33 tons per year. Adding the significance level for SO<sub>2</sub> emissions of 39 tons per year to the baseline actual facility-wide SO<sub>2</sub> emissions of 1.33 gives an allowable SO<sub>2</sub> emission rate of 40.33 tons per year.



- g) The facility-wide greenhouse gas (GHG) emission limitation of 167,916 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2003 and 2004 of 89,194 and 96,640 tons, respectively. Average facility-wide GHG emissions for 2003 and 2004 are 92,917 tons per year. Adding the significance level for GHG emissions of 74,999 tons per year to the baseline actual facility-wide GHG emissions of 92,917 gives an allowable GHG emission rate of 167,916 tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

2. Plantwide Applicability Limitations (PALs)

a) Emission Limitation:

Facility-wide VOC emissions shall not exceed 1149.2 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing VOC emissions on a rolling, 12-month basis from all emissions units that emit VOCs at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total VOC emissions during each calendar month and consecutive 12-month period for each such source. VOC emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

b) Emission Limitation:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM<sub>2.5</sub> emissions on a rolling, 12-month basis from all emissions units that emit PM<sub>2.5</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total PM<sub>2.5</sub> emissions during each calendar month and consecutive 12-month period for each such source. PM<sub>2.5</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

c) Emission Limitation:

Facility-wide PM/PM<sub>10</sub> emissions shall not exceed 31.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM/PM<sub>10</sub> emissions on a rolling, 12-month basis from all emissions units that emit PM/PM<sub>10</sub> at the facility, including but not limited to de



de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total PM/PM<sub>10</sub> emissions during each calendar month and consecutive 12-month period for each such source. PM/PM<sub>10</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

d) Emission Limitation:

Facility-wide NO<sub>x</sub> emissions shall not exceed 124.27 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing NO<sub>x</sub> emissions on a rolling, 12-month basis from all emissions units that emit NO<sub>x</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total NO<sub>x</sub> emissions during each calendar month and consecutive 12-month period for each such source. NO<sub>x</sub> emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

e) Emission Limitation:

Facility-wide CO emissions shall not exceed 255.36 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all emissions units that emit CO at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total CO emissions during each calendar month and consecutive 12-month period for each such source. CO emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

f) Emission Limitation:

Facility-wide SO<sub>2</sub> emissions shall not exceed 40.33 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SO<sub>2</sub> emissions on a rolling, 12-month basis from all emissions units that emit SO<sub>2</sub> at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total SO<sub>2</sub> emissions during each calendar month and consecutive 12-month period for each such source. SO<sub>2</sub> emissions from



non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

g) Emission Limitation:

Facility-wide GHG emissions shall not exceed 167,916 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all emissions units that emit GHG at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total GHG emissions during each calendar month and consecutive 12-month period for each such source. GHG emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

3. PAL Monitoring and Record Keeping Requirements

- a) The permittee shall maintain a copy of all records necessary to determine compliance with any requirement of OAC rule 3745-31-32(A) and of the PAL, including a determination of each emission unit's rolling, 12-month total emissions, for 5 years from the date of such record.
- b) The permittee shall retain a copy of the following records for the duration of the PAL effective period plus five years:
  - (1) a copy of the PAL permit application and any applications for revisions to the PAL; and
  - (2) each annual certification of compliance pursuant to Title V and the data relied on in certifying compliance.
- c) The permittee shall monitor all emissions units at the facility for VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS and/or emission factors).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

4. PAL Reporting Requirements

- a) The permittee shall submit semiannual monitoring reports and prompt deviation reports to the Ohio EPA Northeast District Office in accordance with the applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:
  - (1) Semiannual report:



The semiannual report shall be submitted to the Ohio EPA Northeast District Office within thirty days of the end of each reporting period. This report shall contain the following information:

- a. The identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install.
- b. Total annual emissions (tons per year) based on a rolling, 12-month total for each month in the reporting period recorded pursuant to B.2 of these terms and conditions.
- c. All data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emissions. It is acceptable for this data to be maintained at the facility and made available to the Ohio EPA upon request.
- d. A list of any emissions units modified or added to the major stationary source during the preceding 6-month period.
- e. The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.
- f. A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of any pollutant or the number determined by method included in the PAL permit (OAC rule 3745-31-32(A)(11)(g)).
- g. A signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(2) Deviation report:

The major stationary source owner or operator shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to paragraph (A)(3)(c)(iii) of OAC rule 3745-77-07 and/or Standard Terms and Conditions item A.2.c) of this permit shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by OAC rule 3745-77-07 and/or Standard Terms and Conditions item A.2.c) of this permit. The reports shall contain the following information:

- a. the identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install;
- b. the PAL requirement that experienced the deviation or that was exceeded;



- c. emissions resulting from the deviation or the exceedance; and
- d. a signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(3) Re-validation results:

The owner or operator shall submit to the Ohio EPA Northeast District Office the results of any re-validation test or method within three months after completion of such test or method.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

5. PAL Compliance Demonstration

- a) Emission calculations to demonstrate compliance with the PAL include VOC emissions from startups, shutdowns, and malfunctions.
- b) The permittee shall determine monthly VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM/PM<sub>10</sub> and PM<sub>2.5</sub> emissions in accordance with the Monitoring and Record Keeping Requirements for each emissions unit for the purpose of summing plantwide VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM/PM<sub>10</sub> and PM<sub>2.5</sub> emissions and determining the rolling, 12-month VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, GHG, PM/PM<sub>10</sub> and PM<sub>2.5</sub> emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

6. PAL Permit Requirements

- a) The PALs in section B.1 shall be effective for ten years. The PAL permit term commenced on October 24, 2013.
- b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire until a revised PAL permit is issued if a complete application is received by Ohio EPA Northeast District Office within the time frame specified. (OAC rule 3745-31-32(A)(9)(b))
  - (1) If the permittee fails to meet the application requirements in section B.6.b) or the PAL expires, the facility is subject to the requirements of OAC rule 3745-31-32(A)(8).
  - (2) This permit authorizes projects involving the installation of new emissions units and modification of existing emissions units that do not require an increase in emissions limitations provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.
  - (3) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the Ohio EPA Northeast District Office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.



[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

7. The provisions of OAC rule 3745-114 address Ohio's "Air Toxic Policy" and the mechanism for evaluating certain air toxic contaminants from air emissions sources. The provisions of the regulation do not apply to a pollutant that is subject to a maximum achievable control technology (MACT) standard or residual risk standard under section 112 of the Federal Clean Air Act pursuant to the Ohio Revised Code (ORC) 3704.03(F)(4)(e). The following emissions units at this facility are subject to 40 CFR Part 63, Subpart IIII, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

- B005 (Air supply for E-Coat scuff booth 9.6 mmBtu/hr);
- B006 (Air supply for E-Coat scuff booth 9.6 mmBtu/hr);
- B007 (Air supply for underbody spray booth 9.6 mmBtu/hr);
- B008 (Air supply for prime spray booth 50.0 mmBtu/hr);
- B009 (Air supply for prime spray booth 50.0 mmBtu/hr);
- B010 (Air supply to tutone and repair scuff booth 13.2 mmBtu/hr);
- B011 (Air supply for enamel spray booth no. 1 - 98.0 mmBtu/hr);
- B013 (Air supply for enamel spray booth no. 2 - 98.0 mmBtu/hr);
- B015 (Air supply for enamel spray booth no. 3 - 234.0 mmBtu/hr);
- B019 (Air supply for wax and touchup spray booth 9.6 mmBtu/hr);
- B020 (Air supply for wax and touchup spray booth 16.8 mmBtu/hr);
- B021 (Air supply for tutone/repair dry off oven 7.7 mmBtu/hr);
- B022 (Air supply for dry off oven prime 12.9 mmBtu/hr);
- B025 (Air supply for predelivery spray booth 24.6 mmBtu/hr);
- B026 (Carbon wheel desorption preheat burners 6.0 mmBtu/hr);
- B027 (Carbon wheel desorption boiler 12.5 mmBtu/hr);
- K007 (E-Coat system) including dip tank, oven, and RTO;
- K013 (Prime Guidecoat System) including prime booth, oven, and RTO;
- K014 (Prime Guidecoat System) including prime booth, oven, and RTO;
- K015 (Topcoat/Enamel System #1) including enamel booth, oven, and RTO;
- K016 (Topcoat/Enamel System #2) including enamel booth, oven, and RTO;
- K017 (Topcoat/Enamel System #3) including enamel booth, oven, and RTO;
- K018 (Wax and touchup booth);
- K019 (Wax and touchup booth);
- K021 (Final repair system) including final repair booth, oven, and spot repair;
- K023 (Windshield glass installation process);
- K024 (Sealer operations) including sealer deck, sealer application booth, and ovens;
- P013 (Manual solvent wipe);
- P019 (E-Coat scuff booth);
- P020 (E-Coat scuff booth);
- P021 (Prime and tutone scuff booth); and
- P100 (Purge and clean).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114, and 40 CFR Part 63, Subpart IIII]

The following emissions units at the facility are subject to 40 CFR Part 63, Subpart EEEE, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

- T040 (Windshield Washer Fluid Tank) including the tank and distribution system.



[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114, and 40 CFR Part 63, Subpart EEEE]

The following emissions units at the facility are subject to 40 CFR Part 63, Subpart ZZZZ, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

- B028 (204 HP electrical emergency generator);
- B029 (204 HP electrical emergency generator);
- B030 (204 HP electrical emergency generator);
- B031 (204 HP electrical emergency generator);
- B032 (204 HP electrical emergency generator);
- B033 (204 HP electrical emergency generator);
- B034 (204 HP electrical emergency generator);
- B035 (380 HP firefighting water pump);
- B038 (204 HP electrical emergency generator);
- B039 (204 HP electrical emergency generator); and
- B040 (183 HP Clarke firefighting pump).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-114, and 40 CFR Part 63, Subpart ZZZZ]

In addition, if the toxic air contaminant is an organic Hazardous Air Pollutant (HAP) subject to the MACT standard identified above (40 CFR Part 63, Subpart IIII, Subpart EEEE, and Subpart ZZZZ) and emitted by any air contaminant source not identified above, modeling in accordance with Ohio's "Air Toxic Policy" is not required.

In the event any future MACT standards are deemed applicable to the facility and/or any air contaminant source(s) at the facility, those source(s) will not be subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs.

For air contaminant sources not subject to a MACT standard, physical changes to or changes in the method of operation of any of the emissions units at the facility could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change to such air contaminant sources that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change without first obtaining Ohio EPA approval. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously evaluated;
- b) Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and



- c) Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install would not be required.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- d) A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- e) Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- f) Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

The results of any modeling shall be submitted with the semi-annual report.

Physical changes to or changes in the method of operation of any emissions units at the facility that satisfy the "Air Toxic Policy" do not require a new permit and/or permit modification.

In lieu of the above requirements, the permittee may devise its own method to demonstrate that the change(s) will satisfy the "Air Toxic Policy" subject to approval by the Ohio EPA. This could include initial modeling under "worst case scenario" and evaluating whether or not each change would fall within that scenario and satisfy the "Air Toxic Policy".

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-114-01]

## 8. Revisions to Best Available Technology (BAT) Limits During a Modification under the PAL

### a) Background

Under OAC rule 3745-31-05, all new or modified air contaminant sources, with the exception of sources subject to exemptions and permits-by-rule as defined in OAC rule 3745-31-03, must employ Best Available Technology (BAT) as defined in OAC rule 3745-31-01. BAT requirements have been defined for each air contaminant source contained in this permit.

Under ORC 3704.03(F)(2), no installation permit is required to be obtained for activities that occur under the Plantwide Applicability Limit (PAL) permit if the activities are subject to and in compliance with any applicable PAL and subject to and in compliance with any applicable PAL rules contained in OAC Chapter 3745-31.

Under these provisions, a permit-to-install or permit-to-install and operate is not required to be obtained when an emissions unit covered by the PAL is installed or modified. However, PAL permit emissions units that are installed or modified during the life of the PAL permit must continue to (for an existing source) or begin to (for a new source) employ BAT where applicable.



b) New or Modified Emissions Unit BAT Requirements

Prior to installation or modification of an emissions unit covered under the PAL permit, the owner or operator shall evaluate applicability, and, if applicable, determine BAT. This evaluation and determination shall follow applicable Ohio EPA air quality rules, guidelines, and policies associated with BAT determinations. The determination of BAT shall include the following steps, as appropriate:

- (1) Determination of the size and type of emissions unit that will be considered a “substantially similar source” for the BAT determination purposes.
- (2) Researching emissions limits or work practices for known similar sources. At a minimum, the research should include reviewing the Ohio EPA BAT database, U.S. EPA’s BACT/RACT/LAER database, reviewing applicable state regulation limits (excluding severe non-attainment area regulations), and permits from other similar sources. Only “substantially similar sources” that have been demonstrated to operate satisfactorily in Ohio or other states with similar air quality should be included in this research.
- (3) Completing a cost-effectiveness analysis following Ohio EPA, Division of Air Pollution Control Engineering Guide #46 for any pollutant where the uncontrolled potential-to-emit is greater than 70 tons per year. The uncontrolled potential-to-emit should take into account any federally enforceable limitations or physical limitations on the potential-to-emit.
- (4) A determination of emission rate units to be used for the BAT determination. The units should be consistent with the units utilized in similar Ohio EPA issued emissions unit permits.
- (5) A determination of the monitoring, record keeping, and reporting requirements for the BAT determination. The monitoring, record keeping, and reporting requirements shall be consistent with the monitoring, record keeping, and reporting requirements already established as part of the PAL permit.
- (6) A determination of the compliance method to be used for the BAT determination. The compliance method shall be consistent with the compliance method utilized in the PAL permit for similar emissions units or in similar emissions unit permits issued by Ohio EPA.
- (7) An evaluation of the above information and a determination concerning the selected BAT.

c) The results of the BAT determination shall include, at a minimum, the following:

- (1) a description of the type of emissions unit evaluated;
- (2) the numerical BAT value selected;
- (3) the emission rate unit selected;
- (4) a description of any associated control equipment selected as BAT;



- (5) a description of any federally enforceable restrictions requested to be used; and
- (6) a description of any work practices, raw material specifications, throughput limitations, and source design characteristics to be used.

The owner or operator may consult with Ohio EPA for assistance in determining an acceptable BAT determination.

- d) Once the new or modified source is installed and operating, the owner or operator shall comply with the BAT determination selected utilizing the compliance determination selected. In addition, the owner or operator shall follow any monitoring, record keeping, and reporting selected to support the BAT determination.
- e) The BAT determination selected by the owner or operator, and its associated monitoring, record keeping, reporting, and compliance determination methods shall be effective until the Director issues a revised permit containing a reevaluation and redetermination of BAT.
- f) Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plantwide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.8.b) through B.8.d), and the following paragraph (B.9), shall be considered void and no longer required for changes made in compliance with the requirements of the PAL permit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and OAC rule 3745-31-05]

9. New or Modified Emissions Unit BAT Reporting

Under OAC paragraph 3745-31-32(A)(13)(a)(iv), the owner or operator of the PAL permit shall submit a list of any emissions units modified or added to the major stationary source during the preceding six-month reporting period. In addition to the information required to be submitted under OAC paragraph 3745-31-32(A)(13)(a) for the required semiannual report, the owner or operator of the PAL permit shall include a report describing the work that was done to determine BAT for a new or modified source. This report shall include, at a minimum, the background information collected for the BAT determination and the information described in B.8.b).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and OAC rule 3745-31-05]

- 10. The terms and conditions contained in this permit shall supercede the terms and conditions in Permit to Install (PTI) 02-04022 issued 09/17/2008 for emissions units B004, B005, B006, B007, B008, B009, B010, B011, B013, B015, B019, B020, B021, B022, B023, B024, B025, B026, B027, K007, K013, K014, K015, K016, K017, K018, K019, and P013; PTI 02-09278 issued 09/17/2008 for emissions units K021 and P100 (formerly Z003); PTI 02-22468 issued 02/27/2007 for emissions unit K024; and PTI P0103750 issued 12/29/2008 for emissions unit K023.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- 11. The permittee shall comply with all applicable sections of 40 CFR Part 63, Subpart IIII, for the following emissions units and their associated combustion sources, respectively: K007; K013 (B008 and B022); K014 (B009); K015 (B011 and B026); K016 (B013, B021, and B026); K017 (B015 and B026); K018



(B020); K019 (B019); K021 (B025); K023; K024 (B007); P013; P019 (B005); P020 (B006); and P021 (B010).

Sources P019 (B005), P020 (B006), and P021 (B010) and their associated combustion sources shall comply with the following requirements of 40 CFR Part 63, Subpart IIII (sources K007, K013, K014, K015, K016, K017, K018, K019, K021, K023, K024, and P013 shall comply with the requirements of 40 CFR Part 63, Subpart IIII, under the Emissions Unit Terms and Conditions for these sources):

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart IIII  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 and control measures specified in this section.	See b)(2)a.
b.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

- (2) Additional Terms and Conditions
  - a. 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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

c) Operational Restrictions

- (1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

e) Reporting Requirements

- (1) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

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:

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

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

g) Miscellaneous Requirements

(1) None.

12. The permittee shall comply with any applicable sections of 40 CFR Part 63, Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, no later than the compliance date specified upon issuance of the final rule. Any applicable permit terms and conditions associated with 40 CFR Part 63, Subpart DDDDD, shall be incorporated in accordance with OAC rule 3745-31-32(A)(9)(e) either at the time of PAL permit renewal or Title V permit renewal, whichever occurs first.

The following sources will be subject to 40 CFR Part 63, Subpart DDDDD: East admin. boiler #1/Superior rated at 2.024 mmBtu/hr heat input capacity (emissions unit B041), East admin. boiler #2/Superior rated at 2.024 mmBtu/hr heat input capacity (emissions unit B042), Phosphate boiler #1/Cleaver Brooks rated at 20.992 mmBtu/hr heat input capacity (emissions unit B004), Phosphate boiler #2/Cleaver Brooks rated at 20.992 mmBtu/hr heat input capacity (emissions unit B004), Carbon wheels desorption boiler rated at 10.9 mmBtu/hr (emissions unit B027), West admin. boiler #1/Fitness Center rated at 4.064 mmBtu/hr heat input capacity (emissions unit B043), and West admin. boiler #2/Fitness Center rated at 4.064 mmBtu/hr heat input capacity (emissions unit B044). Combustion sources associated with coating lines and ovens are subject to 40 CFR Part 63, Subpart IIII, and, therefore, are not subject to 40 CFR Part 63, Subpart DDDDD.



Sources B041, B042, B043, and B044 shall comply with the following requirements of 40 CFR Part 63, Subpart DDDDD (sources B004 and B027 shall comply with the requirements of 40 CFR Part 63, Subpart DDDDD, under the Emissions Unit Terms and Conditions for these sources):

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is an existing boiler or process heater in the designed to burn gas 1 subcategory with a heat input capacity less than 5 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emissions limitations/control measures specified in this section.	Boilers or process heaters not subject to emission standards shall meet the tune-up requirements identified in Table 3 as applicable to the unit.  See b)(2)a. and b)(2)b.
b.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

- a. Following the initial compliance date, tune-ups must be conducted for each boiler or process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 of the Subpart. An initial tune-up must be completed for an existing boiler or process heater no later than January 31, 2016; unless the boiler or process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.
- b. For a facility with an existing boiler or process heater as defined in 40 CFR 63.7490(a)(1), a one-time energy assessment must be performed by a qualified



energy assessor no later than January 31, 2016. The one-time energy assessment for existing units must include the following:

- i. A visual inspection of the boiler or process heater system;
- ii. An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
- iii. An inventory of major energy use systems consuming energy from affected boilers or process heaters, which are under the control of the boiler or process heater operator;
- iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
- v. A review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
- vi. A list of cost-effective energy conservation measures that are within the permittee's control;
- vii. A list of energy savings potential of the energy conservation measures identified; and
- viii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

c) Operational Restrictions

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

Table 3 to Subpart DDDDD	Work practices
63.7540(a)(12)	Requirement to conduct a tune-up every 5 years as specified in paragraphs (a)(10)(i) through (vi) of section 63.7540

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

d) Monitoring and/or Recordkeeping Requirements

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



63.7515(d)	Conduct an annual, biennial, or 5-year performance tune-up according to 63.7540(a)(10), (11), or (12), respectively, no later than 13 months, 25 months, or 61 months, respectively, after the initial startup of the new or reconstructed affected source
63.7540(a)(10)	Tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

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

e) Reporting Requirements

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

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550
63.7550 and Table 9 to Subpart DDDDD	Content and submission of compliance reports

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

f) Testing Requirements

- (1) Each tune-up conducted to demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD, shall include the following elements:
- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
  - b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
  - c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
  - d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
  - e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);



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

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

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

g) Miscellaneous Requirements

- (1) None.

13. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:

- B005: Air supply for E-coat scuff booth (9.6 mmBtu/hr);
- B006: Air supply for E-coat scuff booth (9.6 mmBtu/hr);
- B007: Air supply for underbody spray booth (9.6 mmBtu/hr);
- B019: Air supply for wax and touchup spray booth (9.6 mmBtu/hr);
- B021: Air supply for tutone/repair dry off oven (7.7 mmBtu/hr);
- B026: Carbon wheel desorption preheat burners (6.0 mmBtu/hr);
- B028: Emergency generator (204 hp);
- B029: Emergency generator (204 hp);
- B030: Emergency generator (204 hp);
- B031: Emergency generator (204 hp);
- B032: Emergency generator (204 hp);
- B033: Emergency generator (204 hp);
- B034: Emergency generator (204 hp);
- B035: Firefighting water pump (380 hp);
- B038: Emergency generator (204 hp);
- B039: Emergency generator (204 hp);
- B040: Clarke firefighting water pump (183 hp);
- B041: Natural gas fired space heaters;
- G001: Pool vehicle gasoline fill and 20,000 gallon storage tank;
- G002: Vehicle initial gasoline fill and 20,000 gallon storage tank;
- L001: Solvent cold cleaners;
- P012: Paint mix room;
- P015: Body welding;
- P016: Brazing operations;
- P017: Brazing finish (sanding);



- P018: Phosphate coating line;
- P019: E-coat scuff booth;
- P020: E-coat scuff booth;
- P021: Prime and tutone scuff booth;
- P022: D-pillar braze booth;
- P023: Metal finish line grind booth;
- P024: Small container (e.g. totes, drums, day tanks, etc.);
- T001: 12,000 gallon waste purge solvent/paint tank;
- T002: 12,000 gallon waste paint/purge tank;
- T004: 10,000 gallon oil separator storage tank;
- T006: 10,000 gallon brake fluid storage tank;
- T007: 10,000 gallon automatic transmission fluid storage tank;
- T008: 10,000 gallon power steering fluid storage tank;
- T009: 10,000 gallon manual transmission fluid storage tank;
- T010: 10,000 gallon anti-freeze storage tank;
- T011: 6,000 gallon refrigerant storage tank;
- T012: 90,000 gallon No.1 E-coat dump tank;
- T013: 90,000 gallon No. 2 E-coat dump tank;
- T014: two 6,000 gallon E-coat resin storage tanks;
- T016: 6,000 gallon sulfuric acid storage tank;
- T017: 6,000 gallon sodium hydroxide storage tank;
- T019: 6,000 gallon E-coat pigment storage tank; and
- T040: 10,000 gallon methanol underground storage tank.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-05]

14. Emissions units K007, K013, K014, K015, K016, K017, K018, K019, K021, K023, K024, P013 and P100 are subject to the following work practices specified in OAC rule 3745-21-29(E) for coating-related activities and cleaning materials for coating operations for which emission limitations are specified under OAC rule 3745-21-29(C):
- a) Store all VOC-containing coatings, thinners, and coating-related waste materials in closed containers;
  - b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, and coating-related waste materials are kept closed at all times except when depositing or removing these materials;
  - c) Minimize spills of VOC-containing coatings, thinners, and coating-related waste materials;
  - d) Convey VOC-containing coatings, thinners, and coating-related waste materials from one location to another in closed containers or pipes;
  - e) Minimize VOC emission from cleaning of storage, mixing and conveying equipment; and
  - f) Develop and implement a work practice plan to minimize VOC emissions from cleaning and from purging of equipment associated with all coating operations for which requirements are specified in OAC rule 3745-21-29 paragraphs (C) and (D). The work practice plan shall specify



practices and procedures to ensure that VOC emissions from the following operations are minimized:

- (1) Vehicle body wiping;
- (2) Coating line purging;
- (3) Flushing of coating systems;
- (4) Cleaning of spray booth grates;
- (5) Cleaning of spray booth walls;
- (6) Cleaning of spray booth equipment;
- (7) Cleaning external spray booth areas; and
- (8) Other housekeeping measures (e.g., keeping solvent-laden rags in closed containers).

Comment: If a facility subject to this rule already has a work practice plan in place under the national emission standards for hazardous air pollutants (NESHAP), the facility can add to its NESHAP work practice plan the practices and procedures for minimizing non-HAP VOC emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29]

15. The existing emergency or limited use compression ignition (CI) reciprocating internal combustion engines (RICE), less than or equal to 500 brake horse power and located at a major source for hazardous air pollutants (HAPs), are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The existing stationary CI RICE, emissions units B028, B029, B030, B031, B032, B033, B034, B035, B038 and B039, installed before 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ, no later than 5/3/13.

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

16. The new emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake horse power, and located at a major source for hazardous air pollutants (HAPs), is/are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The new stationary CI RICE, emissions unit B040, installed on or after 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ, upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart ZZZZ, and 40 CFR Part 60, Subpart IIII]

17. Pursuant to 40 CFR Part 64, the permittee has submitted and Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions units K007, K013, K014, K015, K016 and K017 located



**Draft Title V Permit**

Ford Motor Company - Ohio Assembly Plant

**Permit Number:** P0085256

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

at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

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



**Draft Title V Permit**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0085256  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

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



**1. B004, Phosphate Heaters**

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

Phosphate heaters (20.9 MMBtu/hr)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2), d)(3), and d)(4) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)	Boilers or process heaters not subject to emission standards shall meet the tune-up requirements identified in Table 3 as



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	In accordance with 40 CFR 63.7485, this emissions unit is an existing boiler or process heater in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emissions limitations/control measures specified in this section.	applicable to the unit.  See b)(2)a and b)(2)b.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. Following the initial compliance date, tune-ups must be conducted for each boiler or process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 of the Subpart. An initial tune-up must be completed for an existing boiler or process heater no later than January 31, 2016; unless the boiler or process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.
- b. For a facility with an existing boiler or process heater as defined in 40 CFR 63.7490(a)(1), a one-time energy assessment must be performed by a qualified energy assessor no later than January 31, 2016. The one-time energy assessment for existing units must include the following:
  - i. a visual inspection of the boiler or process heater system;
  - ii. an evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
  - iii. an inventory of major energy use systems consuming energy from affected boilers or process heaters, which are under the control of the boiler or process heater operator;
  - iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
  - v. a review of the facility’s energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;



- vi. a list of cost-effective energy conservation measures that are within the permittee's control;
- vii. a list of energy savings potential of the energy conservation measures identified; and
- viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.  
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]
- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.  
[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]
- (2) The permittee shall maintain monthly records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this emissions unit:

MPV = (Xi/Sum of Xi) multiplied by TPV

where:

MPV = the monthly prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;



Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either natural gas or LPG.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall use emission factors from AP-42 to calculate monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (4) The permittee shall maintain monthly records of the calculated, monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit in lbs per month, and the rolling, 12-month VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit, in tons per year.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of natural gas burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

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

63.7515(d)	Conduct an annual, biennial, or 5-year performance tune-up according to 63.7540(a)(10), (11), or (12), respectively, no later than 13 months, 25 months, or 61 months, respectively, after the initial startup of the new or reconstructed affected source
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]



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

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550
63.7550 and Table 9 to Subpart DDDDD	Content and submission of compliance reports

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

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]

- (2) Each tune-up conducted to demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD, shall include the following elements:



- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
- b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
- c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
- d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
- e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

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

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

g) Miscellaneous Requirements

- (1) None.



**2. B010, Tutone and repair scuff booth air supply**

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

Air supply for tutone and repair scuff booth (13.2 MMBtu/hr)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Not applicable.  See b)(2)b.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2), d)(3), and d)(4) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a.



(2) Additional Terms and Conditions

- a. This emissions unit is associated with emissions unit P021 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the Facility-Wide terms and conditions for emissions unit P021 in this permit.
- b. This emissions unit is not subject to the emission limitation established in OAC rule 3745-17-10(B)(1) because it is direct-fired.

c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall maintain monthly records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this emissions unit:

$$MPV = (Xi / \text{Sum of } Xi) \text{ multiplied by TPV}$$

where:

MPV = the monthly prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either natural gas or LPG.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall use emission factors from AP-42 to calculate monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.



[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (4) The permittee shall maintain monthly records of the calculated, monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit in lbs per month, and the rolling, 12-month VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit, in tons per year.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of natural gas burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

g) Miscellaneous Requirements

- (1) None.



**3. B015, Enamel Booth #3 air supply**

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

Air supply for enamel spray booth No. 3 (DSO) (234.0 MMBtu/hr)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(4), and d)(5) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> , and GHG emissions from this facility as specified in B.2.
f.	OAC rule 3745-31-05(D)(1)(a)	NO <sub>x</sub> emissions shall not exceed 24.9 tons per year. See c)(2).
g.	40 CFR Part 63, Subpart IIII	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. This emissions unit is associated with emissions unit K017 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K017 in this permit.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

(2) Natural gas usage in this emissions unit shall not exceed 498 mmscf per year.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and PTI P0104237]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

(2) The permittee shall maintain annual records of the volume of natural gas burned, in mmscf, in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and PTI P0104237]

(3) The permittee shall maintain monthly records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this emissions unit:

$$MPV = (X_i / \text{Sum of } X_i) \text{ multiplied by TPV}$$

where:



MPV = the monthly prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either natural gas or LPG.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (4) The permittee shall use emission factors from AP-42 to calculate monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (5) The permittee shall maintain monthly records of the calculated, monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit in lbs per month, and the rolling, 12-month VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit, in tons per year.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of natural gas burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall submit annual reports that specify the total natural gas usage, in mmscf, for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and PTI P0104237]



f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 24.9 tons per year.

Applicable Compliance Method:

Compliance with the annual NO<sub>x</sub> emission limitation shall be assumed provided that the annual natural gas usage limitation in c)(2) is met.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and PTI P0104237]

c. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]

g) Miscellaneous Requirements

(1) None.



**4. B027, Carbon wheels desorption boiler**

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

Boiler-carbon wheels (10.9 MMBtu/hr)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2), d)(3), and d)(4) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575)	Boilers or process heaters not subject to emission standards shall meet the tune-up requirements identified in Table 3 as



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	In accordance with 40 CFR 63.7485, this emissions unit is an existing boiler or process heater in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emissions limitations/control measures specified in this section.	applicable to the unit.  See b)(2)a and b)(2)b.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. Following the initial compliance date, tune-ups must be conducted for each boiler or process heater within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 of the Subpart. An initial tune-up must be completed for an existing boiler or process heater no later than January 31, 2016; unless the boiler or process heater is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.
- b. For a facility with an existing boiler or process heater as defined in 40 CFR 63.7490(a)(1), a one-time energy assessment must be performed by a qualified energy assessor no later than January 31, 2016. The one-time energy assessment for existing units must include the following:
  - i. a visual inspection of the boiler or process heater system;
  - ii. an evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
  - iii. an inventory of major energy use systems consuming energy from affected boilers or process heaters, which are under the control of the boiler or process heater operator;
  - iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
  - v. a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;



- vi. a list of cost-effective energy conservation measures that are within the permittee's control;
- vii. a list of energy savings potential of the energy conservation measures identified; and
- viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

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

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

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

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall maintain monthly records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this emissions unit:

MPV = (Xi/Sum of Xi) multiplied by TPV

where:

MPV = the monthly prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;



Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either natural gas or LPG.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall use emission factors from AP-42 to calculate monthly VOC, PM2.5, PM/PM10, NOx, CO, SO2 and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (4) The permittee shall maintain monthly records of the calculated, monthly VOC, PM2.5, PM/PM10, NOx, CO, SO2 and GHG emission rates for this emissions unit in lbs per month, and the rolling, 12-month VOC, PM2.5, PM/PM10, NOx, CO, SO2 and GHG emission rates for this emissions unit, in tons per year.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of natural gas burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

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

Table with 2 columns: Reference Code and Description. Rows include 63.7515(d), 63.7540(a)(10), and 63.7560(a)-(c).

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]



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

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550
63.7550 and Table 9 to Subpart DDDDD	Content and submission of compliance reports

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

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]

- (2) Each tune-up conducted to demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD, shall include the following elements:



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- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
- b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;
- c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
- d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;
- e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

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

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

g) Miscellaneous Requirements

- (1) None.



**5. K007, E-coat system**

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

E-coat tank and 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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	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)a.
b.	OAC rule 3745-21-29(C)(1)(a)	See b)(2)b.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)c.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM, 40 CFR Part 63, Subpart IIII, OAC rule 3745-21-29(C)(1)(a)(i), and OAC rule 3745-31-32(A)(6).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) and d)(3) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
e.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)d.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
g.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(6), e)(1) and e)(7).

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:
  - i. 0.17 kilogram of VOC per liter of applied coating solids when solids turnover ratio ( $R_T$ ) is 0.16 or greater.
  - ii.  $0.17 \times 350^{(0.160 - R_T)}$  kg of VOC per liter of applied coating solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.



iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in 40 CFR 60.393(E).

b. The permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio ( $R_T$ ) is 0.16 or greater.

ii.  $0.70 \times 350^{(0.160 - R_T)}$  pounds of VOC per gallon of solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.

iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

c. The permittee shall employ a permanent total enclosure VOC capture system that captures VOC emissions from the E-Coat system. The total capture efficiency shall be 100 percent, by weight, at all times the emissions unit is in operation.

The E-Coat system by design and operation provides a permanent total enclosure. This emissions unit's VOC capture efficiency shall, therefore, be presumed to be 100 percent, by weight. This determination was made by Ohio EPA at the permittee's request, based on the submission of data which verify that the entrance and exit of the E-Coat system are not natural draft openings as defined in U.S. EPA Methods 204 through 204F, 40 CFR Part 51, Appendix M.

d. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

c) Operational Restrictions

- (1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall collect and record the following information for each day for this emissions unit:

- a. The name and identification number of each material (coating, solvent, etc.) added to the E-Coat tank;
- b. The VOC content, in pounds VOC per gallon and in pounds VOC per gallon of solids, of each material added to the E-Coat tank;
- c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material added to the E-Coat tank;
- d. The monthly, uncontrolled, volume-weighted average VOC content of all the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-09;



- e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds VOC per gallon of solids. The daily, controlled VOC emission rate shall be calculated using (i) the daily, uncontrolled, volume-weighted average 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;
- f. The total uncontrolled VOC emissions from all the materials added to the E-Coat tank, in pounds; and
- g. The total, controlled VOC emissions from all the materials added to the E-Coat tank, in pounds. The controlled VOC emission rate shall be calculated using (i) the total VOC emissions from d)(2)f above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

- (3) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. The name and identification number of each coating material added to the E-Coat tank;
  - b. The VOC content, in pound of VOC per gallon of solids, of each material added to the E-Coat tank;
  - c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material employed;
  - d. The monthly, uncontrolled, volume-weighted average VOC content of the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-10; and
  - e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds of VOC per gallon of solids. The monthly, controlled VOC emission rate shall be calculated using (i) the monthly 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.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and OAC rule 3745-21-29(C)]

- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).

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



- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:

a. 64.3 Monitoring design criteria:

- i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
- ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.

b. 64.9 Record keeping requirements:

- i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)b of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)a of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.



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

- (4) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart IIII, and PTI P0104237]

- (5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit during the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (6) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (7) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.

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

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:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.



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The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The VOC destruction efficiency testing shall be conducted within 18 months of final issuance of the Title V renewal permit and, at a minimum, every 5 years thereafter.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart IIII, and PTI P0104237]



b. Emission Limitation:

In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

- i. 0.17 kilogram of VOC per liter of applied coating solids when solids turnover ratio ( $R_T$ ) is 0.16 or greater.
- ii.  $0.17 \times 350^{(0.160 - R_T)}$  kg of VOC per liter of applied coating solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.
- iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in 40 CFR 60.393(c)(1)(i)(E).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in 40 CFR 60.393.

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

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

c. Emission Limitation:

The permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

- i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio ( $R_T$ ) is 0.16 or greater.
- ii.  $0.70 \times 350^{(0.160 - R_T)}$  pounds of VOC per gallon of solids when  $R_T$  is greater than or equal to 0.040 and less than 0.160.
- iii. When  $R_T$  is less than 0.040, there is no emission limit.

$R_T$  is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in OAC rule 3745-21-29(F).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may



be used to determine the VOC contents of all coatings employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

d. Emission Limitation:

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart IIII, and PTI P0104237]

g) Miscellaneous Requirements

(1) None.



**6. K021, Final repair system**

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

Final repair booth and 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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-29(C)(1)(f)	VOC emissions shall not exceed 4.8 lbs per gallon of coating, excluding water and exempt solvents.  See B.14 in the facility-wide terms and conditions and b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-29(C)(1)(f), OAC rule 3745-31-32(A)(6), OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart III.
c.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See c)(1), c)(2), d)(2) through d)(6) and e)(3).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(8) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	<p>40 CFR Part 63, Subpart IIII</p> <p>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.</p>	See b)(2)c.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. The permittee shall comply with this limitation by demonstrating that coatings employed have a VOC content of 4.8 lbs VOC per gallon of coating as a daily volume-weighted average, as applied, excluding water and exempt solvents.
- b. OC emissions resulting from cleanup solvent usage is accounted for under emissions unit P100.
- c. 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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:

a. For each coating in use at the facility:

- i. the name and VOC content as received and as applied; and
- ii. the type of coating, as identified under OAC rule 3745-21-29(C).

b. All data, calculations, and test results (including U.S. EPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The amount (gallons) of each coating used each month at the facility.

d. Records pertaining to a coating line subject to OAC rule 3745-21-29(C)(1)(f) in which the owner or operator elects to demonstrate the ongoing status of compliance with the applicable emission limitation by means of a daily volume-weighted average VOC content:

- i. date of operation;
- ii. the name and identification number of each coating, as applied on the date of operation;



- iii. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied on the date of operation; and
- iv. the daily volume-weighted average VOC content of all coatings, as applied on the date of operation, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for  $C_{VOC,2}$ .

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C) (1) and OAC rule 3745-17-11(C)]

- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]



- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K021 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any monthly record showing that the VOC content of any of the coatings employed exceeded 4.8 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

- (2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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



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:

VOC emissions shall not exceed 4.8 lbs per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

b. Emission Limitation:

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.



**Draft Title V Permit**

Ford Motor Company - Ohio Assembly Plant

**Permit Number:** P0085256

**Facility ID:** 0247030471

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

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart III, and PTI P0104237]

g) Miscellaneous Requirements

(1) None.



**7. K023, Windshield glass installation**

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

Windshield Glass Installation Process

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-29(C)(2)(a) and (b), OAC rule 3745-31-32(A)(6) and 40 CFR Part 60, Subpart IIII.
b.	OAC rule 3745-21-29(C)(2)(a)	<p>Volatile organic compound (VOC) emissions from glass bonding primer shall not exceed 7.5 pounds per gallon of coating, excluding water and exempt compounds, used for the installation of any glass windows during the assembly of automobiles.</p> <p>See B.14 in the facility-wide terms and conditions.</p>
c.	OAC rule 3745-21-29(C)(2)(b)	<p>VOC emissions from adhesive shall not exceed 2.1 lbs per gallon of coating, excluding water and exempt compounds.</p> <p>See B.14 in the facility-wide terms and conditions.</p>
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(4) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	<p>40 CFR Part 63, Subpart IIII</p> <p>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.</p>	See b)(2)c.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. The emission limitations listed above include emissions from vehicle flange and glass cleaners, primers, and adhesives.
- b. The glass bonding primer designation in this permit refers to the new material the permittee has proposed to apply to the windshield which serves the combined function of cleaner and primer.
- c. 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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

c) Operational Restrictions

- (1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month:

- a. the name and identification number of each coating (glass bonding primer and adhesive) and cleanup solvent, as applied;
- b. the VOC content of each coating and cleanup solvent, excluding water and exempt solvents, in pounds per gallon, as applied;
- c. the VOC content of each coating and cleanup solvent, in pounds per gallon, as applied;
- d. the number of gallons of each coating and cleanup solvent employed; and
- e. the total VOC emission rate for all coatings and cleanup solvents, in pound [the summation of (c x d) for each coating and cleanup solvent].

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

- (2) The permittee shall maintain an annual record of the total number of vehicles processed in this emissions unit for the calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (4) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K023 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]



e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of noncomplying coatings (greater than 7.5 pounds VOC per gallon for glass bonding primer and greater than 2.1 pounds VOC per gallon for adhesives; excluding water and exempt solvents for both). The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

- (2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

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:

VOC emissions shall not exceed 7.5 pounds per gallon of coating (glass bonding primer), excluding water and exempt compounds, used for the installation of any glass windows during the assembly of automobiles.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

b. Emission Limitation:

VOC emissions shall not exceed 2.1 pounds per gallon of coating (adhesive), excluding water and exempt compounds.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

c. Emission Limitation:

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart III, and PTI P0104237]



**Draft Title V Permit**  
Ford Motor Company - Ohio Assembly Plant  
**Permit Number:** P0085256  
**Facility ID:** 0247030471  
**Effective Date:** To be entered upon final issuance

- g) Miscellaneous Requirements
  - (1) None.



**8. K024, Sealer Application Operation**

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

Sealer operations including a sealer deck, sealer application booth, and two ovens

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c), OAC rule 3745-31-32(A)(6), OAC rules 3745-21-29(C)(2)(d), (e) and (g), OAC rule 3745-21-09(U)(3) and 40 CFR Part 63, Subpart IIII.
b.	OAC rule 3745-21-09(U)(1)(c)	Volatile organic compound (VOC) emissions from antichip materials shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents.
c.	OAC rule 3745-21-09(U)(3)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-21-09(U)(1)(c).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1), d)(2), and d)(4) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
e.	OAC rule 3745-21-29(C)(2)(d)	VOC emissions from sealer shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds. See B.14 in the facility-wide terms and conditions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-29(C)(2)(e)	VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
g.	OAC rule 3745-21-29(C)(2)(g)	VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	In accordance with 40 CFR 63.3091(c) the average organic hazardous air pollutant (HAP) emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.  In accordance with 40 CFR 63.3091(d) the average organic hazardous air pollutant (HAP) emissions from all deadener materials shall not exceed 0.010 kg/kg (lb/lb) of deadener material used during each month.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The VOC content limitation specified in b)(1)b does not include OC emissions from cleanup materials. Applicable requirements for cleanup materials are accounted for in emissions unit P100.

c) Operational Restrictions

(1) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the volume of each coating, as applied, in gallons;
  - c. the VOC content of each coating, as applied, in pounds per gallon;
  - d. the total VOC emissions from all coatings employed [summation of (b x c) for all coatings]; and
  - e. the VOC content of each coating, excluding water and exempt solvents, in pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, OAC rule 3745-21-09(U), and OAC rule 3745-21-29(C)]

- (2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for this emissions unit:
  - a. the total VOC emissions from all coatings employed [summation of d)(1)d for each month], in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (4) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for emissions unit K024 in lbs per month, and the rolling, 12-month VOC emission rate for this emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of non-complying coatings (greater than 3.5 pounds VOC per gallon for antichip materials and greater than 5.4 pounds VOC per gallon from sealer, deadener, and underbody coatings; excluding water and exempt solvents for all). The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(U), and OAC rule 3745-21-29(C)]



- (2) The permittee shall submit annual reports that specify the actual annual VOC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

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:

Volatile organic compound (VOC) emissions from antichip materials shall not exceed 3.5pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

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

b. Emission Limitation:

VOC emissions from sealer shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

c. Emission Limitation:

VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

d. Emission Limitation:

VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

e. Emission Limitation:

In accordance with 40 CFR 63.3091(c) the average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.

In accordance with 40 CFR 63.3091(d) the average organic hazardous air pollutant (HAP) emissions from all deadener materials shall not exceed 0.010 kg/kg (lb/lb) of deadener material used during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3151.

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

- (2) The "Test Procedure for Determining Bake Oven Exhaust Control Device VOC Loading for Specific Coatings", section 21 of AAMA/USEPA document, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate for Automobile and Light Duty Truck Topcoat Operation" shall be used to determine the VOC contents and VOC distribution of all coatings employed in this emissions unit.

U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(U), and OAC rule 3745-21-29(C)]



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**Facility ID:** 0247030471

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g) Miscellaneous Requirements

- (1) This emissions unit, K024, combines sealer operations at the facility into one process with a common vent from the ovens. Sealer operations were previously identified as emissions units K008, K009, K010, K011, K012, P010 and P011.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]



**9. Emissions Unit Group -Air supply sources: B008,B009,B011,B013,B020,B022,B025,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B008	Air supply for prime spray booth (50.0 MMBtu/hr)
B009	Air supply for prime spray booth (50.0 MMBtu/hr)
B011	Air supply for enamel spray booth No. 1 (98.0 MMBtu/hr)
B013	Air supply for enamel spray booth No. 2 (98.0 MMBtu/hr)
B020	Air supply for wax and touchup spray booth (16.8 MMBtu/hr)
B022	Air supply for dry off oven prime (12.9 MMBtu/hr)
B025	Air supply for predelivery spray booth (24.6 MMBtu/hr)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2), d)(3), and d)(4) contribute to the calculation of the total VOC, PM <sub>2.5</sub> ,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM/PM <sub>10</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a. through b)(2)g.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. Emissions unit B008 is associated with emissions unit K013 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K013 in this permit.
- b. Emissions unit B009 is associated with emissions unit K014 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K014 in this permit.
- c. Emissions unit B011 is associated with emissions unit K015 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K015 in this permit.
- d. Emissions unit B013 is associated with emissions unit K016 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K016 in this permit.
- e. Emissions unit B020 is associated with emissions unit K018 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K018 in this permit.
- f. Emissions unit B022 is associated with emissions unit K013 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K013 in this permit.
- g. Emissions unit B025 is associated with emissions unit K021 and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for emissions unit K021 in this permit.

c) Operational Restrictions

- (1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]



d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall maintain monthly records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this emissions unit:

$$MPV = (X_i / \text{Sum of } X_i) \text{ multiplied by TPV}$$

where:

MPV = the monthly prorated volume of the fuel used, either natural gas or LPG;

$X_i$  = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of  $X_i$  = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either natural gas or LPG.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (3) The permittee shall use emission factors from AP-42 to calculate monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (4) The permittee shall maintain monthly records of the calculated, monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit in lbs per month, and the rolling, 12-month VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit, in tons per year.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of natural gas burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]

g) Miscellaneous Requirements

- (1) None.



**10. Emissions Unit Group -Body and trim air supply: B023,B024,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B023	Body shop air supply (130.3 MMBtu/hr)
B024	Trim shop air supply (24.9 MMBtu/hr)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO <sub>2</sub> in this rule for this emissions unit.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> ,NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> ,NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2), d)(3), and d)(4) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , PM/PM <sub>10</sub> ,NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.



(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall only employ natural gas and LPG as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

d) Monitoring and/or Recordkeeping Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

(2) The permittee shall maintain monthly records of the volumes of natural gas and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of natural gas and LPG burned in this emissions unit for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this emissions unit:

$$MPV = (Xi/Sum\ of\ Xi) \text{ multiplied by } TPV$$

where:

MPV = the monthly prorated volume of the fuel used, either natural gas or LPG;

Xi = the heat input capacity of this emissions unit, in mmBtu/hr;

Sum of Xi = the summed total heat input, in mmBtu/hr of all operational combustion emissions units located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either natural gas or LPG.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

(3) The permittee shall use emission factors from AP-42 to calculate monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

(4) The permittee shall maintain monthly records of the calculated, monthly VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit in lbs per



month, and the rolling, 12-month VOC, PM<sub>2.5</sub>, PM/PM<sub>10</sub>, NO<sub>x</sub>, CO, SO<sub>2</sub> and GHG emission rates for this emissions unit, in tons per year.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of natural gas burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or LPG was burned in this emissions unit. Each report shall be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]



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- g) Miscellaneous Requirements
  - (1) None.



**11. Emissions Unit Group -Prime (Guidecoat) systems: K013,K014,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K013	Prime booth and oven includes spray prime, hood anti-chip and blackout coatings
K014	Prime booth and oven includes spray prime, hood anti-chip and blackout coatings

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	Volatile organic compound (VOC) emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.
b.	OAC rule 3745-21-29(C)(1)(c)and (e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.  See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)	The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.  See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C), OAC rule 3745-31-



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		32(A)(6), OAC rules 3745-21-29(C)(1)(c) and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(3), c)(4), d)(9) through d)(13) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  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 and control measures specified in this section.	See b)(2)c.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- c. 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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

c) Operational Restrictions

- (1) Emissions unit K013 includes Prime booth No. 1 and oven (includes spray prime, hood anti-chip, and blackout coatings). Alternatively, emissions unit K013 may be adjoined to the front of the Topcoat booth 1, 2, or 3 (emissions unit K015, K016, or K017) to apply Guidecoat coatings in a "3-Wet" sequence.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

- (2) Emissions unit K014 includes Prime booth No. 1 and oven (includes spray prime, hood anti-chip, and blackout coatings). Alternatively, emissions unit K014 may be adjoined to the front of the Topcoat booth 1, 2, or 3 (emissions unit K015, K016, or K017) to apply Guidecoat coatings in a "3-Wet" sequence.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]



- (3) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (5) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

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

- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and
- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]



- (3) The permittee shall maintain records for each of emissions units K013 and K014 that will enable, for each calendar day, the calculation of the daily VOC emission rate for each emissions unit in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculations on a daily basis and shall maintain records of the results of the calculations.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).

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

- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:

a. 64.3 Monitoring design criteria:

- i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
- ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.

b. 64.9 Record keeping requirements:

- i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.

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

- (7) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for each of emissions units K013 and K014 in lbs per month, and the rolling, 12-month VOC emission rate for each emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]



- (8) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (10) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (12) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (13) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification



made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-29(C), and 40 CFR Part 60, Subpart MM]

- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from each of emissions units K013 and K014 for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.

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



- (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201A and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted within 18 months of final issuance of the Title V renewal permit and, at a minimum, every 5 years thereafter.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

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

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



A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted within 18 months of final issuance of the Title V renewal permit and, at a minimum, every 5 years thereafter.



The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

c. Emission Limitation:

VOC emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may



be used to determine the VOC contents of all coatings employed in this emissions unit.

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

d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

e. Emission Limitation:

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10



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lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

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

- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).

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

g) Miscellaneous Requirements

- (1) None.



**12. Emissions Unit Group -Topcoat (Enamel) systems: K015,K016,K017,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K015	Enamel booth No. 1 and oven
K016	Enamel booth No. 2 and oven
K017	Enamel booth No. 3 and 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) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	<p>Volatile organic compound (VOC) emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.</p>
b.	OAC rule 3745-21-29(C)(1)(d)and (e)	<p>VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.</p> <p>See B.14 in the facility-wide terms and conditions.</p>
c.	OAC rule 3745-31-05(A)(3)	<p>The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-17-11(C), OAC rule 3745-31-32(A)(6), OAC rules 3745-21-29(C)(1)(d) and (e), 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(4), c)(5), d)(10) through d)(14) and e)(7).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions apply to this emissions unit. The PALs for VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, PM <sub>2.5</sub> , NO <sub>x</sub> , CO, SO <sub>2</sub> and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII  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 and control measures specified in this section.	See b)(2)c.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	40 CFR Part 64 (64.1 through 64.10)  This emissions unit is subject to an emission limitation for a regulated air pollutant, uses a control device to achieve compliance, and has pre-control emissions greater than 100 tons per year.	The permittee shall implement a compliance assurance monitoring (CAM) program consistent with the monitoring and record keeping provisions of this permit.  See d)(1), d)(2), d)(6), e)(1) and e)(6).



(2) Additional Terms and Conditions

- a. The RTO incinerators shall be operated at a minimum VOC emission destruction efficiency of 95% or a maximum VOC outlet concentration of 25 ppm at all times the emissions unit is in operation.
- b. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- c. 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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

c) Operational Restrictions

- (1) Emissions unit K015 includes Enamel booth No. 1 and oven to apply Topcoat (includes basecoat and clearcoat application). Alternatively, emissions unit K013 or K014 may be adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

- (2) Emissions unit K016 includes Enamel booth No. 2 and oven to apply Topcoat (includes basecoat and clearcoat application). Alternatively, emissions unit K013 or K014 may be adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]



- (3) Emissions unit K017 includes Enamel booth No. 3 and oven to apply Topcoat (includes basecoat and clearcoat application). VOC emissions from the oven are controlled by a separate RTO. Alternatively, emissions unit K013 or K014 may be adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0104237]

- (4) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (5) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizers when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers, when the emissions unit was in operation, was more than



28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the emissions unit was in compliance; and

- b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (3) The permittee shall maintain records for each of emissions units K015, K016, and K017 that will enable, for each calendar day, the calculation of the daily VOC emission rates from each emissions unit in both lbs VOC per day and lbs VOC per gallon of deposited solids, in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculations on a daily basis and shall maintain records of the results of the calculations.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (4) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart MM (60.390 through 60.398).

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

- (5) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (6) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 64, including the following sections:

- a. 64.3 Monitoring design criteria:

- i. The permittee shall implement a thermal oxidizer inspection and maintenance program, to detect and repair worn or malfunctioning components.
- ii. The permittee shall maintain a log detailing the operation and maintenance of the emission capture systems, add-on control devices, and continuous parameter monitoring systems (CPMS) for all oven exhaust VOC emissions.

- b. 64.9 Record keeping requirements:

- i. The permittee shall comply with the applicable record keeping requirements specified in 40 CFR 64.9(b) for all oven exhaust VOC emission related systems.

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



- (7) The permittee shall maintain monthly records for each of emissions units K015, K016, and K017 of the volume weighted average mass of the VOC per volume of applied coating solids and the calculations required by 40 CFR Part 60, Subpart MM, section 60.393.

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

- (8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates for each of emissions units K015, K016 and K017 in lbs per month, and the rolling, 12-month VOC emission rates for each emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

- (9) The permittee shall maintain daily records of the number of hours of operation for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (11) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (12) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (13) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and



- d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (14) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-29(C), and 40 CFR Part 60, Subpart MM]

- (3) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of each daily record showing that the RTO is not meeting a minimum destruction efficiency of 95% or the maximum VOC outlet concentration of 25 ppm for a period of 15 minutes or more. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from each of emissions units K015, K016 and K017 for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]



- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (6) The permittee shall submit semiannual reports identifying any deviation from the CAM compliance requirements in section d)(6). These reports shall include, at a minimum, the information required under 40 CFR 64.9(a) for all oven exhaust VOC emission related systems.

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

- (7) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

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:

Facility-wide PM<sub>2.5</sub> emissions shall not exceed 26.32 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine PM<sub>2.5</sub> emissions from this emissions unit to establish a facility-wide PM<sub>2.5</sub> emission rate, the permittee shall conduct, or have conducted, representative PM<sub>2.5</sub> emission testing for this emissions unit to establish the PM<sub>2.5</sub> emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201A and 202.

The PM<sub>2.5</sub> emission rate testing shall be conducted within 18 months of final issuance of the Title V renewal permit and, at a minimum, every 5 years thereafter.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s)



of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

b. Emission Limitation:

The RTO(s) associated with this emissions unit shall be operated at a minimum VOC destruction efficiency of 95% or a maximum outlet VOC concentration of 25 ppm at all times when this emissions unit is in operation.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to establish that the RTO is operating properly (i.e., proper operation is considered a VOC destruction efficiency (DE) of 95% by weight) or, alternatively, in the case where inlet VOCs are too low to demonstrate a 95% DE, demonstrate compliance with the equivalent VOC emission limitation of 25 ppm VOC in accordance with U.S. EPA Method 25A of 40 CFR Part 60, Appendix A.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). Capture efficiency testing shall be performed by the



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permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted within 18 months of final issuance of the Title V renewal permit and, at a minimum, every 5 years thereafter.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

The emission testing requirements for this emissions unit are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0104237]



c. Emission Limitation:

VOC emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this emissions unit.

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

d. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

e. Emission Limitation:

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



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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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

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

- (2) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).

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

g) Miscellaneous Requirements

- (1) None.



**13. Emissions Unit Group -Wax, blackout, touchup booths: K018,K019,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K018	Wax and touch-up booth
K019	Wax and touch-up booth

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(d)	Volatile organic compound (VOC) emissions shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted basis (for all coatings employed, excluding cavity wax).
b.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-31-32(A)(6), OAC rule 3745-21-29(C)(2)(c), OAC rule 3745-17-11(C) and 40 CFR Part 63, Subpart IIII.
c.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See c)(1), c)(2), d)(4) through d)(8) and e)(4).
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1), d)(2), and d)(9) contribute to the calculation of the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		total VOC emissions from this facility as specified in B.2.
e.	OAC rule 3745-21-29(C)(2)(c)	VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.  See B.14 in the facility-wide terms and conditions.
f.	40 CFR Part 63, Subpart IIII  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 and control measures specified in this section.	See b)(2)b.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

- a. OC emissions resulting from cleanup solvent usage is accounted for under emissions unit P100.
- b. 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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a



destruction or removal 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.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) The permittee shall comply with applicable operating restrictions required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the name, identification number, and type of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating employed;
  - c. for each type of coating specified in b)(1)a, the daily volume-weighted average VOC content of all the coatings employed, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ;
  - d. the number of gallons of all repair lacquers employed;
  - e. the total VOC emission rate for all coatings employed, in pounds; and
  - f. the number of hours of operation.



[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, OAC rule 3745-21-09(U), and OAC rule 3745-21-29(C)]

- (2) The permittee shall collect and record the following information for each day for this emissions unit:
- a. the name and identification number of each coating employed;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating employed; and
  - c. the daily volume-weighted average VOC content of all the coatings employed, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(U), and OAC rule 3745-21-29(C)]

- (3) The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]



- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (9) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates for each of emissions units K018 and K019 in lbs per month, and the rolling, 12-month VOC emission rate for each emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]

e) Reporting Requirements

- (1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content of all the coatings employed, excluding cavity wax, exceeded 3.5 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

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

- (2) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content from cavity wax exceeded 5.4 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]



- (3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

- (4) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.2.c) of the Standard terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) The permittee shall comply with applicable notification and reporting requirements required under 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

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

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:

VOC emissions shall not exceed 3.5 lbs per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted basis (for all coatings employed, excluding cavity wax).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2). U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this emissions unit.

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

b. Emission Limitation:

VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2). U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-29(C)]

c. Emission Limitation:

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 which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal 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.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods and procedures in 40 CFR 63.3161 or 40 CFR 63.3171.

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

g) Miscellaneous Requirements

- (1) None.



**14. Emissions Unit Group -Wipe, purge, and clean: P013,P100,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P013	Solvent wipe
P100	Organic compound emissions resulting from cleaning and purging of the equipment associated with emissions units K007 through K020

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)a.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-29(E), OAC rule 3745-31-32(A)(6) and 40 CFR Part 63, Subpart III.
b.	OAC rule 3745-21-29(E)	See B.14 in the facility-wide terms and conditions.
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(2) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
d.	40 CFR Part 63, Subpart III	The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart III of 40 CFR Part 63 – Applicability of General Provisions to Subpart III shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.



(2) Additional Terms and Conditions

- a. The permittee shall comply with the work practice standards in 40 CFR Part 63, Subpart IIII, section 63.3094.

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for emissions unit P013 for each month:

- a. the name and identification number of each solvent wipe material, as applied;
- b. the volume, in gallons, of each solvent wipe material, as applied;
- c. the VOC content of each solvent wipe material, as applied, in pounds per gallon; and
- d. the total VOC emissions from all solvent wipe materials employed [summation of (b x c) for all solvent wipe materials], in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-29, and PTI P0104237]

- (2) The permittee shall collect and record the following information for emissions unit P100 for each month:

- a. the name and identification number of each purge and cleanup material, as applied;
- b. the volume, in gallons, of each purge and cleanup material, as applied;
- c. the VOC content of each purge and cleanup material, as applied, in pounds per gallon; and
- d. the total VOC emissions from all purge and cleanup materials employed [summation of (b x c) for all purge and cleanup materials], in pounds.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-29, and PTI P0104237]

- (3) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates for each of emissions units P013 and P100 in lbs per month, and the rolling, 12-month VOC emission rates for each emissions unit, in tons per year.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-32]



**Draft Title V Permit**

Ford Motor Company - Ohio Assembly Plant

**Permit Number:** P0085256

**Facility ID:** 0247030471

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

e) Reporting Requirements

- (1) The permittee shall also submit annual reports that specify the total VOC emissions from each of emissions units P013 and P100 for the previous calendar year. These reports shall include the calculations of the annual emissions and shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-32, and PTI P0104237]

f) Testing Requirements

- (1) Formulation data shall be used to determine the VOC contents of all the materials employed in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(U), and OAC rule 3745-21-29]

g) Miscellaneous Requirements

- (1) None.