



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

5/14/2015

Certified Mail

Gary Jaeger
Whirlpool Corporation - Clyde Operations
119 Birdseye St.
Clyde, OH 43410-1397

Facility ID: 0372020143
Permit Number: P0117223
County: Sandusky

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

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 1/29/2015. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

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

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

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office



Response to Comments

Facility ID:	0372020143
Facility Name:	Whirlpool Corporation - Clyde Operations
Facility Description:	Household Laundry Equipment
Facility Address:	119 Birdseye St. Clyde, OH 43410-1397 Sandusky County
Permit:	P0117223, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Fremont News Messenger on 01/30/2015. The comment period ended on 03/01/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: Removal of 40 CFR Part 63, Subpart DDDDD (Boiler MACT)

- a. Comment: Whirlpool-Clyde is no longer a major source for HAPs (PTE 2.3 tpy) and therefore, not applicable to MACT Subpart DDDDD and would like it removed from emissions units B002-B004 and B006-B010. Company has submitted a letter to US EPA and Ohio EPA stating its re-designation as an area source of HAP emissions and has also rescinded the Initial Notification submittal.
- b. Response: All references to 40 CFR Part 63, Subpart DDDDD have been removed from the Title V permit.

2. Topic: P187 (Cooling Tower CT-3)

- a. Comment: Short term and long term PE limits as well as drift eliminator requirements established under OAC 3745-31-05(F) seem extraneous. Company would like the removal of short term and long term limits and re-permit in accordance with the "pick one" source design characteristic case-by-case BAT determination. Company to submit an administrative modification request to PTI P0117222.
- b. Response: Re-permitting discussed with company and it was decided to leave emissions limits as-is under OAC 3745-31-05(F)



3. Topic: Facility-Wide T&C B.4

- a. Comment: The second paragraph of B.4 contains an extra "Z" in reference to 40 CFR Part 63, Subpart ZZZZ
- b. Response: Removed the extra "Z" from this citation

4. Topic: General compliance requirements for NESHAP NNNN (emissions units: B006, B007, K011, K012, K015, K016, K017, K005 & K009)

- a. Comment: The general compliance requirements for NESHAP NNNN under operational restrictions incorrectly references 63.4100(a)-(e). There is no 63.4100(e) in the rule and should be changed to state "63.4100(a)-(d)"
- b. Response: Changed the NESHAP reference for each emissions unit.

5. Topic: Emissions units group K005/K009

- a. Comment: Emissions units K005 and K009 have been combined into an emissions unit group. However, based on the differences between the operations among the E-coat paint systems, Whirlpool would like K005 and K009 to be ungrouped and listed individually.
- b. Response: The emissions units have been un-grouped and listed individually in the permit.

6. Topic: Emissions unit K017 description typo

- a. Comment: The operations, property and/or equipment description for K017 has "alpha" spelled incorrectly
- b. Response: The description has been corrected.

7. Topic: Typo in SOB for K011, K012, K015, K016, K017, K005 & K009

- a. Comment: An extraneous use of the word "pounds" in the emission limitation and Whirlpool requests that it be removed
- b. Response: The statement of basis (SOB) is only issued with the draft permit. The agency will make note of extraneous use of 'pounds'.



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit

for

Whirlpool Corporation - Clyde Operations

Facility ID:	0372020143
Permit Number:	P0117223
Permit Type:	Renewal
Issued:	5/14/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Whirlpool Corporation - Clyde Operations

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Preliminary Proposed Title V Permit

Whirlpool Corporation - Clyde Operations

Permit Number: P0117223

Facility ID: 0372020143

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0372020143
Facility Description: Household Laundry Equipment
Application Number(s): A0048386, A0051882, A0052344, A0053325
Permit Number: P0117223
Permit Description: Renewal Title V operating permit for a household laundry equipment manufacturing facility.
Permit Type: Renewal
Issue Date: 5/14/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087632

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

Whirlpool Corporation - Clyde Operations
119 Birdseye St.
Clyde, OH 43410-1397

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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, Northwest 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



Preliminary Proposed Title V Permit
Whirlpool Corporation - Clyde Operations
Permit Number: P0117223
Facility ID: 0372020143
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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



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

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

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

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

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

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

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

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



Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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.



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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, Northwest 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.



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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21 and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
K018	Dry Porcelain Powder Roundware Coating Line, West Side
K020	Dry Porcelain Powder Roundware Coating Line, East Side
K022	Portable Hand Powder Spray System
P124	West plastic silos and bulk material delivery system PTI #P0117856
P125	South plastics silos and bulk material delivery system PTI #P0117856
P184	NE Plastics Silos, delivery system, & Surge bin PTI #P0117856
T011	Porcelain Fuel Oil Tank

[OAC rule 3745-77-07(A)(13)]

3. The following emissions units located at this facility are subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

EU ID	Operations, Property and/or Equipment Description
P028	Emergency Power Generator - North Unit in Power House PBR #12999
P148	Diesel Emergency Fire Pump # 1 PBR#12999
P190	127 HP Emergency NG-fired generator for computer network PBR#13011
P191	West Side Emergency Diesel Fire Pump #2 PBR #13584

[OAC rule 3745-77-07(A)(13)]

4. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions units P028, P029, P030, P039, P148 and P191 are considered existing commercial emergency stationary RICE located at an area source of HAP emissions and are not subject to this subpart per 63.6585(f)(2). The above emissions units must meet the definition of emergency stationary RICE in 63.6675, which includes operating according to the provisions specified in 63.6640(f).

In accordance with 40 CFR Part 63, Subpart ZZZZ section 63.6590(c), final MACT rule for "Stationary Reciprocating Internal Combustions Engines," emissions unit P190 has no requirements under this subpart since it is subject to regulations under 40 CFR Part 60, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR 63, Subpart ZZZZ]

5. The permittee is subject to 40 CFR Part 60, Subpart JJJJ, New Source Performance Standards: Stationary Spark Ignition Internal Combustion Engines. The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart JJJJ. The permittee shall also comply with all applicable



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requirements of 40 CFR Part 60, Subpart A (General Provisions) as identified in Table 3 of 40 CFR Part 63, Subpart JJJJ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 60 Subpart JJJJ and Subpart A. The NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

EU ID	Operations, Property and/or Equipment Description
P190	127 HP Emergency NG-fired generator for computer network

The permittee shall comply with the applicable restrictions under 40 CFR Part 60, Subpart JJJJ for emissions unit P190, including the following sections:

60.4233(e), 60.4234 and Table 1	Emissions standards for owners and operators
60.4237(c)	Monitoring requirements
60.4243(b), (d) and (e)	Compliance requirements
60.4245(a) and (b)	Notification, reports and records for owners and operators
60.4246	General provisions

[Authority for Term: 40 CFR, Part 60, Subpart JJJJ]



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C. Emissions Unit Terms and Conditions



1. B006, Porcelain 119 Flatware Furnace

Operations, Property and/or Equipment Description:

Porcelain 119 Flatware Furnace

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 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
c.	OAC rule 3745-31-05(A)(3) (PTI 03-7624, issued 12/29/93)	4.44 lbs PE/day, 0.81 ton PE/year 25.9 lbs nitrogen oxides (NOx)/day, 4.7 tons NOx/year 10.4 lbs carbon monoxide (CO)/day, 1.8 tons CO/year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B).
d.	OAC rule 3745-18-06 (D)	See b)(2)a.
e.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
f.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. Since natural gas is the only fuel fired in this emissions unit, no SO2 emission limitation is established pursuant to OAC rule 3745-18-06(A) for this emissions unit.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI # 03-7624]

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

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI # 03-7624]

- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]



e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-7624]

- (2) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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 PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1)

[OAC rule 3745-77-07(C)(1) and PTI #03-7624]

- b. Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method: If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-7624]

- c. Emission Limitations: 4.44 lb PE/day, 0.81 tons PE/yr

Applicable Compliance Method: The permittee may determine compliance with the PE limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then multiplying by 24.



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Compliance with the annual limitation shall be assumed as long as compliance with the daily limitation is maintained (the annual limitation was calculated by multiplying the daily emission limitation by 365 and dividing by 2000).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-7624]

- d. Emission Limitations: 25.9 lbs NO_x/day, 4.7 tons NO_x/yr

Applicable Compliance Method: The permittee may determine compliance with the hourly allowable NO_x emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NO_x/mm cu. ft, and then multiplying by 24.

Compliance with the annual emission limitation shall be assumed as long as compliance with the daily emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, compliance with the hourly allowable NO_x emission limitation above shall be determined in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-7624]

- e. Emission Limitations: 10.4 lbs CO/day; 1.8 tons CO/yr

Applicable Compliance Method: Compliance with the daily CO emission limitation may be determined by multiplying the AP-42, Section 1.4 (revised 7/98) emission factor of 84 lbs CO/mm³cu.ft. of natural gas by the maximum hourly natural gas burning capacity of the emissions unit (mm cu.ft/hr), and then multiplying by 24.

Compliance with the annual limitation shall be assumed as long as compliance with the daily emission limitation is maintained (the annual limitation was calculated by multiplying the daily emission limitation by 365 and dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-7624]

- f. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).



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Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

g) Miscellaneous Requirements

(1) None.



2. B007, Porcelain 113 Roundware Furnace

Operations, Property and/or Equipment Description:

Porcelain 113 Roundware Furnace

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 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input
c.	OAC rule 3745-31-05 (PTI#03-6632, issued 7/29/92)	0.89 lb nitrogen oxides (NOx)/hr, 3.89 tons NOx/yr 0.16 lb PE/hr, 0.68 ton PE/yr The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B).
d.	OAC rule 3745-18-06 (D)	See b)(2)a.
e.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
f.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. Since natural gas is the only fuel fired in this emissions unit, no SO₂ emission limitation is established pursuant to OAC rule 3745-18-06(A) for this emissions unit.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-6632]

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

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1)) and PTI #03-6632]

- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]



e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1)) and PTI #03-6632]

- (2) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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 PE shall not exceed 20% opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1)

[OAC rule 3745-77-07(C)(1) and PTI #03-6632]

- b. Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method: If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-6632]

- c. Emission Limitations: 0.89 lbs NOx/hr, 3.89 tons NOx/yr

Applicable Compliance Method: The permittee may determine compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NOx/mm cu. ft.



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Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

If required, compliance with the hourly allowable NOx emission limitation above shall be determined in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-6632]

- d. Emission Limitations: 0.16 lb PE/hr, 0.68 ton PE/yr

Applicable Compliance Method: The permittee may determine compliance with the PE limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the daily emission limitation by 365 and dividing by 2000).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-6632]

- e. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- g) Miscellaneous Requirements

- (1) None.



3. K005, #1 E-Coat Paint System

Operations, Property and/or Equipment Description:

No. 1 e-coat paint system

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(K)(1)	2.8 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents (See b)(2)a.)
b.	OAC rule 3745-31-05 (PTI #03-1758, issued 7/31/91)	The total VOC emissions from emissions units K005, K009, K010 and K011, combined, shall not exceed 460 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(K) and 40 CFR Part 63, Subpart NNNN.
c.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
d.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee adds VOC materials to the electrocoating dip tank associated with this emissions unit under the following scenarios:



- i. during the day, only compliant materials (pastes and resins) are added;
- ii. during the day, both compliant (pastes and resins) and noncompliant materials (solvents) are added and the resulting mixture is compliant; or
- iii. during the day, only noncompliant solvents or a noncompliant mixture of materials (solvents, pastes and resins) are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under section d)(1) of this permit.

c) Operational Restrictions

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

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the electrocoating dip tank:
 - a. the name and identification number of each material added to the dip tank;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank.
 - c. the number of gallons of each material added to the dip tank, excluding water and exempt solvents;
 - d. on the days when a compliant mixture of materials are added to the dip tank, the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing [d)(1)b. x d)(1)c.] for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system]; and
 - e. on the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tank and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of the entire tank, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from the dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section f)(2)b.



[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (2) The permittee shall collect and record the following information for each month for emissions units K005, K009, K010 and K011, combined:
 - a. the name and identification number of each material employed;
 - b. the VOC content of each material employed, in pounds per gallon;
 - c. the volume, in gallons, of each material employed;
 - d. the emissions of VOC for each material employed (b x c), in pounds; and
 - e. the total emissions of VOC for all the materials employed (summation of d for all materials, divided by 2000), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing an exceedance of the VOC content limitation of 2.8 lbs VOC/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]



- (2) The permittee shall submit annual reports that summarize the actual annual VOC emissions for emissions units K005, K009, K010 and K011, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (3) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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 Limitations: 2.8 lbs of VOC/gallon of coating, excluding water and exempt solvents and 2.8 lbs of VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvent (on the days when solvents are added to the dip tank)

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section d)(1) of the terms and conditions of this permit.

The daily, volume -weighted average of all the materials added to the dip tank shall be calculated using the following equation:

$$\text{Daily volume-weighted average} = \frac{[\text{summation of } (G_i \times \text{VOC}_i)]}{[\text{summation of } G_i]}$$

for i = 1 to n

where:

i - 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day

G_i = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOC_i = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents



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[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- b. Emission Limitation: 460 tons/yr VOC

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements in Section d)(2) of this permit and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- c. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- g) Miscellaneous Requirements

- (1) None.



4. K009, #2 E-Coat Paint System

Operations, Property and/or Equipment Description:

#2 E-Coat Paint System

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(K)(1)	2.8 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents (See b)(2)a.)
b.	OAC rule 3745-31-05 (PTI #03-1758, issued 7/31/91)	The total VOC emissions from emissions units K005, K009, K010 and K011, combined, shall not exceed 460 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(K) and 40 CFR Part 63, Subpart NNNN.
c.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
d.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee adds VOC materials to the electrocoating dip tank associated with this emissions unit under the following scenarios:



- i. during the day, only compliant materials (pastes and resins) are added;
- ii. during the day, both compliant (pastes and resins) and noncompliant materials (solvents) are added and the resulting mixture is compliant; or
- iii. during the day, only noncompliant solvents or a noncompliant mixture of materials (solvents, pastes and resins) are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under section d)(1) of this permit.

c) Operational Restrictions

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

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the electrocoating dip tank:
 - a. the name and identification number of each material added to the dip tank;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank.
 - c. the number of gallons of each material added to the dip tank, excluding water and exempt solvents;
 - d. on the days when a compliant mixture of materials are added to the dip tank, the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing [d)(1)b. x d)(1)c.] for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system]; and
 - e. on the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tank and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of the entire tank, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from the dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section f)(2)b.



[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (2) The permittee shall collect and record the following information for each month for emissions units K005, K009, K010 and K011, combined:
 - a. the name and identification number of each material employed;
 - b. the VOC content of each material employed, in pounds per gallon;
 - c. the volume, in gallons, of each material employed;
 - d. the emissions of VOC for each material employed (b x c), in pounds; and
 - e. the total emissions of VOC for all the materials employed (summation of d for all materials, divided by 2000), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing an exceedance of the VOC content limitation of 2.8 lbs VOC/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]



- (2) The permittee shall submit annual reports that summarize the actual annual VOC emissions for emissions units K005, K009, K010 and K011, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (3) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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 Limitations: 2.8 lbs of VOC/gallon of coating, excluding water and exempt solvents and 2.8 lbs of VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvent (on the days when solvents are added to the dip tank)

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section d)(1) of the terms and conditions of this permit.

The daily, volume -weighted average of all the materials added to the dip tank shall be calculated using the following equation:

$$\text{Daily volume-weighted average} = \frac{[\text{summation of } (G_i \times \text{VOC}_i)]}{[\text{summation of } G_i]}$$

for i = 1 to n

where:

i - 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day

G_i = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOC_i = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents



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[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- b. Emission Limitation: 460 tons/yr VOC

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements in Section d)(2) of this permit and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- c. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- g) Miscellaneous Requirements

- (1) None.



5. K011, #3 E-Coat Paint System

Operations, Property and/or Equipment Description:

#3 E-Coat Paint System

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(K)(1)	2.8 lbs pounds of VOC per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents [See b)(2)a.]
b.	40 CFR Part 60, Subpart SS	0.90 kg VOC/liter of applied coating solids, based on a monthly volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids
c.	OAC rule 3745-31-05 (PTI #03-1758, issue 7/31/91)	The total VOC emissions from emissions units K005, K009, K010 and K011 combined, shall not exceed 460 tons per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(K), 40 CFR Part 60, Subpart SS and 40 CFR Part 63, Subpart NNNN.
d.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
e.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		apply.

(2) Additional Terms and Conditions

- a. The permittee adds VOC materials to the electrocoating dip tank associated with this emissions unit under the following scenarios:
 - i. during the day, only compliant materials (pastes and resins) are added ;
 - ii. during the day, both compliant (pastes and resins) and noncompliant materials (solvents) are added and the resulting mixture is compliant; or
 - iii. during the day, only noncompliant solvents or a noncompliant mixture of materials (solvents, pastes and resins) are added.

In order to ensure compliance with the VOC content limitation (in pounds/gallon of coating, excluding water and exempt solvents), the permittee shall be required to monitor and keep records of the above scenarios as required under section d)(1) of this permit.

c) Operational Restrictions

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

63.4100(a) – (d) [OAC rule 3745-77-07(A)(1)]	general compliance requirements
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d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the electrocoating dip tank:
 - a. the name and identification number of each material added to the dip tank;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank.
 - c. the number of gallons of each material added to the dip tank, excluding water and exempt solvents;
 - d. on the days when a compliant mixture of materials are added to the dip tank, the daily, volume-weighted average VOC content of the combination of materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [calculated by summing (bxc) for all materials, divided by the total number of gallons, excluding water and exempt solvents, of all materials added to the system]; and



- e. on the days when a noncompliant material (solvent) is added to the dip tank or a mixture of materials is added to the dip tank and the calculated daily, volume-weighted average VOC content exceeds the allowable VOC content limitation, the VOC content of the entire tank, in pounds per gallon, excluding water and exempt solvents. This shall be determined by collecting a post-material-add composite sample from the dip tank and performing a laboratory analysis of the VOC content of the sample in accordance with the procedures specified in section f)(2)b.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (2) Each month, the permittee shall determine the monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids, in kilograms per liter, calculated as follows:

Calculate the mass of VOC'S consumed (Mo+Md) during the calendar month by the following equation:

$$Mo+Md = [\text{summation of } (L_{ci} \times D_{ci} \times W_{oi}) \text{ for } i = 1,2, \dots, n + \text{summation of } (L_{dj} \times D_{dj}) \text{ for } j = 1,2,\dots,m]$$

where:

Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

Lci = the total volume, in liters, of coating i consumed, as received

Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOC'S in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the calendar month

Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

$$Ls = \text{summation of } (L_{ci} \times V_{si}) \text{ for } i = 1, 2, \dots, n$$

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)



V_{si} = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

Calculate the volume-weighted average mass of VOC'S consumed per unit volume of coating solids applied during the calendar month by the following equation:

$$G = (M_o + M_d) / (L_s \times T)$$

where:

G = the volume-weighted average mass of VOC'S in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter)

T = transfer efficiency (0.95)

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart SS and PTI #03-1758]

- (3) The permittee shall collect and record the following information for each month for emissions units K005, K009, K010 and K011, combined:
 - a. the name and identification number of each material employed;
 - b. the VOC content of each material employed, in pounds per gallon;
 - c. the volume, in gallons, of each material employed;
 - d. the emissions of VOC for each material employed (b x c), in pounds; and
 - e. the total emissions of VOC for all the materials employed (summation of d for all materials, divided by 2000), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations



63.4131(a) – (c)	maintenance of records
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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC emission limitation of 0.9 kg VOC/liter of coating solids (based on a monthly, volume-weighted average).

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart SS and PTI #03-1758]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any daily record showing an exceedance of the VOC content limitation of 2.8 lbs VOC/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (3) The permittee shall submit annual reports that summarize the actual annual VOC emissions for emissions units K005, K009, K010 and K011, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- (4) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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:



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Effective Date: To be entered upon final issuance

- a. Emission Limitations: 2.8 lbs of VOC/gallon of coating, excluding water and exempt solvents and 2.8 lbs of VOC/gallon of coating, as a daily volume-weighted average, excluding water and exempt solvent (on the days when solvents are added to the dip tank)

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section d)(1) of the terms and conditions of this permit.

The daily, volume -weighted average of all the materials added to the dip tank shall be calculated using the following equation:

Daily volume-weighted average = [summation of (Gi X VOCi:)] / [summation of Gi]
for i = 1 to n

where:

i - 1, 2, 3, ...n

n = the total number of the different types of materials added to the dip tank for that day

Gi = the number of gallons of material i (excluding water and exempt solvents) added to the dip tank for that day

VOCi = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- b. Emission Limitation: 0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average

Applicable Compliance Method: Compliance shall be based upon the record keeping required in Section d)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart SS and PTI #03-1758]

- c. Emission Limitation: 460 tons/yr VOC

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements in Section d)(3) of this permit and shall be the sum of the 12 monthly VOC emission rates for the calendar

[OAC rule 3745-77-07(C)(1) and PTI #03-1758]

- d. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).



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Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

g) Miscellaneous Requirements

(1) None.



6. K012, Powder Coat System

Operations, Property and/or Equipment Description:

organic powder coat paint system

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(K)(1)	2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents
b.	OAC rule 3745-17-11(C)	See c)(1), c(2) and d)(2) through d)(6)
c.	OAC rule 3745-31-05(A)(3) (PTI 03-01146, issued 11/6/07)	See b)(2)b.
d.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
e.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Each coating employed in this emissions unit shall meet the limitation of 2.8 lbs VOC/gallon of coating, excluding water and exempt solvents.

b. No limits, pursuant to OAC rule 3745-31-05, were established in PTI #03-1146 for this emissions unit.



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.

[OAC rule 3745-17-11(C)(1) and (2)(b)] and OAC rule 3745-77-07(C)(1)]

- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]

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 employed; and
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating employed.

[OAC rule 3745-77-07(C)(1) and PTI #03-01146]

- (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 modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

- (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.



[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

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

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

- (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 person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

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

[OAC rule 3745-17-11(C)(2)(e),(f), and (g), and OAC rule 3745-77-07(C)(1)]

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

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations



63.4131(a) – (c)	maintenance of records
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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coating materials (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)and PTI #03-01146]

- (2) The permittee shall submit quarterly deviation reports that identify any daily record showing that the control device(s) was/were not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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: 2.8 lbs of VOC/gallon of coating, excluding water and exempt solvents



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Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #01146]

- b. Emission Limitation: Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #01146]

- c. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- (2) Any determination of VOC content*, solids content, or density of a coating shall be based on the coating as employed (as applied), including the addition of any thinner or viscosity reducer to the coating. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24 or an equivalent or alternative method.

* "VOC content" means all volatile organic compounds that are in a coating expressed as pounds of VOC per gallon, excluding water and exempt solvents, and kilograms of VOC per liter of coating solids.

[OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements

- (1) None.



7. K015, 119 Porcelain Roundware - Wet System

Operations, Property and/or Equipment Description:

119 Porcelain Roundware - Wet System

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(K)(1)	2.8 lbs of VOC per gallon of coating, excluding water and exempt solvents
b.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(2) through d)(6)
	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
c.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Each coating operation (reinforcing/stipple applications and coating dip tank) is equipped with baffles and a water curtain for material recovery.

c) Operational Restrictions

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



[OAC rule 3745-17-11(C)(1) and (2)(b), OAC rule 3745-77-07(A)(1)]

- (2) In the event the control device(s) is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]

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 employed; and
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating employed.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for control device(s), 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 appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall conduct periodic inspections of the control device(s) 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.

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device(s) 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.



[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall document each inspection (periodic and annual) of the control device(s) 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 person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

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

[OAC rule 3745-17-11(C)(2)(e),(f), and (g), and OAC rule 3745-77-07(C)(1)]

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

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]



e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coating materials (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation reports that identify any daily record showing that the control device(s) was/were not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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: 2.8 lbs of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1)]



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- b. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- g) Miscellaneous Requirements

- (1) None.



8. K016, Powder Coat System

Operations, Property and/or Equipment Description:

Upstairs organic powder coating system, tied to K010.

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)(a) (PTI P0104267, issued 6/17/09)	2.93 lbs volatile organic compounds (VOC)/hr and 12.83 tons VOC/yr from the color coating operation and clear coating operation combined. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(K)(1) and 40 CFR Part 63, Subpart NNNN.
b.	OAC rule 3745-31-05-(A)(3)(a)(ii)	See b)(2)b.
c.	OAC rule 3745-21-09(K)(1)	2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(2) through d)(6)
e.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
f.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this emissions unit [PE is emitted in the form of filterable particulate matter 10 microns or less in size (PM₁₀)]. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to emissions of particulate matter less than or equal to 10 microns (PM₁₀), nitrogen oxides (NO_x) and carbon monoxide (CO) from this emissions unit since the calculated annual emissions for PM₁₀, NO_x and CO are less than ten tons per year.

Each coating operation (color coat and clear coat) is equipped with a dry filtration system consisting of cartridge filters and "final" filters in series. The exhaust from each dry filtration system is directed back to the associated powder coating room. The color coating operation additionally utilizes a cyclone to reclaim powder coating material before the exhaust is directed to the cartridge and "final" filters. All emissions of particulate matter from the dry filtration system are PM₁₀.

NO_x and CO are emitted as bi-products from the combustion of natural gas from the gel oven.

c) Operational Restrictions

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

[OAC rule 3745-17-11(C)(1) and (2)(b), OAC rule 3745-77-07(A)(1)]

(2) In the event the control device(s) is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]



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 employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
 - c. the VOC content as applied, in pounds per pound, of each coating employed;
 - d. the quantity, in pounds, of each coating employed;
 - e. the emissions of VOC for each coating employed (c x d), in pounds;
 - f. the total emissions of VOC for all coatings employed (summation of e for all coatings, divided by 2000), in tons; and
 - g. the annual, year-to-date VOC emission rate for all coatings employed, [summation of f. for each calendar month to date from January to December], in tons.

[OAC rule 3745-77-07(C)(1), PTI #P0104267 and OAC rule 3745-21-09(K)(1)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for control device(s), 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 appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall conduct periodic inspections of the control device(s) 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.

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device(s) 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.

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]



- (5) The permittee shall document each inspection (periodic and annual) of the control device(s) 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 person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

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

[OAC rule 3745-17-11(C)(2)(e),(f), and (g), and OAC rule 3745-77-07(C)(1)]

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

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coating materials (i.e., for VOC content). The notification shall include a copy of such record and



shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-21-09(K)(1), PTI #P0104267 and OAC rule 3745-77-01(C)(1)]

- (2) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from all coating usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #P0104267]

- (3) The permittee shall submit quarterly deviation reports that identify any daily record showing that the control device(s) was/were not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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 Limitations: 2.93 lbs volatile organic compounds (VOC)/hr and 12.83 tons VOC/yr from the color coat booth and clear coat booth combined.

Applicable Compliance Method:The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (488.8 pounds per hour) by the maximum VOC content of the coating (0.006 pound per pound).



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The annual allowable VOC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI #P0104267]

- b. Emission Limitation: 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section d)(1) of the terms and conditions of this permit.

[OAC 3745-77-07(C)(1), PTI #P0104267 and OAC 3745-21-09(K)(1)]

- c. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- g) Miscellaneous Requirements

- (1) None.



9. K017 Alpha Powder Coat System (High Gloss)

Operations, Property and/or Equipment Description:

Alpha powder coat system

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)(a) PTI P0104945, issued 6/25/09	7.55 lbs volatile organic compounds (VOC)/hr and 33.07 tons VOC/yr from the color coating operation and clear coating operation combined. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(K)(1) and 40 CFR Part 63, Subpart NNNN.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	OAC rule 3745-21-09(K)(1)	2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(2) through d)(6)
e.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	See 40 CFR Part 63.4090(a) Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).
f.	40 CFR 63.1-15 (40 CFR 63.4101)	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

a. The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3)(a) are not applicable to the particulate emissions (PE) emitted from this emissions unit [PE is emitted in the form of filterable particulate matter 10 microns or less in size (PM10)]. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to emissions of particulate matter less than or equal to 10 microns (PM10), nitrogen oxides (NOx) and carbon monoxide (CO) from this emissions unit since the calculated annual emissions for PM10, NOx and CO are less than ten tons per year.

Each coating operation (color coat and clear coat) is equipped with a dry filtration system consisting of cartridge filters and "final" filters in series. The exhaust from each dry filtration system is directed back to the associated powder coating room. All emissions of particulate matter from the dry filtration system are PM10.

NOx and CO are emitted as bi-products from the combustion of natural gas from the gel oven and final cure oven.

c) Operational Restrictions

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

[OAC rule 3745-17-11(C)(1) and (2)(b), OAC rule 3745-77-07(A)(1)]

(2) In the event the control device(s) is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (d)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]



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 employed;
 - b. the VOC content of each coating(excluding water and exempt solvents), as applied, in pounds per gallon [the VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$].
 - c. the VOC content as applied, in pounds per pound, for each coating employed;
 - d. the quantity, in pounds, of each coating employed;
 - e. the emissions of VOC for each coating employed (c x d), in pounds;
 - f. the total emissions of VOC for all coatings employed (summation of e for all coatings, divided by 2000), in tons; and
 - g. the annual, year-to-date VOC emission rate for all coatings employed, [summation of f. for each calendar month to date from January to December], in tons.

[OAC rule 3745-77-07(C)(1), PTI #P0104945, OAC rule 3745-21-09(K)(1)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for control device(s), 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 appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall conduct periodic inspections of the control device(s) 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.

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device(s) 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.

[OAC rule 3745-17-11(C)(2)(c)and OAC rule 3745-77-07(C)(1)]



- (5) The permittee shall document each inspection (periodic and annual) of the control device(s) 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 person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

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

[OAC rule 3745-17-11(C)(2)(e),(f), and (g), and OAC rule 3745-77-07(C)(1)]

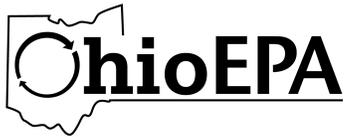
- (7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coating materials (i.e., for VOC content). The notification shall include a copy of such record and



shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[OAC rule 3745-21-09(K)(1), PTI #P0104945 and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from all coating usage for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #P0104945]

- (3) The permittee shall submit quarterly deviation reports that identify any daily record showing that the control device(s) was/were not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	submission of deviation reports

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

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 Limitations: 7.55 lbs volatile organic compounds (VOC)/hr and 33.07 tons VOC/yr from the color coating operation and clear coating operation combined.

Applicable Compliance Method: The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established



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by multiplying the maximum hourly coatings usage rate (1680 pounds per hour) by the maximum allowable OC content of the coating (0.0045 pound per pound). The annual allowable OC limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

[OAC 3745-77-07(C)(1) and PTI #P0104945]

- b. Emission Limitation: 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in Section d)(1) of the terms and conditions of this permit.

[OAC 3745-77-07(C)(1), PTI #P0104945 and OAC 3745-21-09(K)(1)]

- c. Emission Limitation: Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.1 lbs/gal) of coating solids used in the affected source during each compliance period (monthly).

Applicable Compliance Method:

Compliant coating option	Compliance shall be demonstrated in accordance with 63.4140(d) - Equation 2
Emission rate without add-on control option	Compliance shall be demonstrated in accordance with 63.4151 - Equations 1 and 1A through 1C and, if applicable 63.4151(e)(4); 63.4151 - Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart NNNN]

- g) Miscellaneous Requirements

- (1) None.



10. P187, Cooling Tower CT-3 (2000 ton unit)

Operations, Property and/or Equipment Description:

Cooling Tower CT-3(2000 ton unit)

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(F)	0.63 lb of particulate matter less than or equal to 10 microns in size (PM10)/hr 2.76 tons of PM10/yr See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 PTI P0117222, issued 8/13/14	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for this emissions unit. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1).

i. 0.63 lb PM10/hr, 2.76 tons PM10/yr

All emission of particulate matter from the cooling tower are PM10.

b. The Best Available Technology (BAT) requirements under 3745-31-05(A)(3), have been determined to be the use of a drift eliminator capable of achieving an



outlet drift factor of 0.005 gallons drift per 100-gallons circulating water flow for PM10 established in accordance with OAC rule 3745-31-05(F) [See c)(1)].

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

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the emissions of PM10 since the potential to emit, taking into account the voluntary restriction on the use of a drift eliminator, is less than 10 tons per year.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).

c) **Operational Restrictions**

- (1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit potential to emit [See b)(2)a.):

- a. The permittee shall not exceed a total dissolved solids (TDS) content of 4,200 ppm in the cooling water for this emissions unit.
- b. The use of a drift eliminator capable of achieving an outlet drift factor of 0.005 gallons drift per 100-gallons circulating water flow for PM10.

[OAC rule 3745-77-07(A)(1) and PTI P0117222]

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

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



- a. The permittee shall test and record the TDS content, in ppm, of the cooling water at least once per month using a conductivity meter or other U.S. EPA-approved test procedures or an equivalent method approved by the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1)) and PTI P0117222]

- (2) Each month, the permittee shall calculate and record PM10 emissions, in lbs per hr as a monthly average. The PM10 shall be calculated as follows:

$$(6000 \text{ gal/min}) (\text{ppm TDS}) (0.005/100) (8.34 \text{ lbs/gal}) (60 \text{ min/hr}) = \text{PM10, in lbs/hr}$$

Where:

6,000 gallons/minute = the maximum water flow rate;

ppm TDS = the TDS level, on a monthly average basis, if more than one measurement is taken in a month;

0.005 = the maximum drift loss factor;

60 min/hr = conversion factor for minutes to hours;

8.34 lbs/gal = density of water

[OAC rule 3745-77-07(C)(1)) and PTI P0117222]

- (3) Each month, the permittee shall use the information in d)(2) to calculate the cumulative PM10 to date, for the calendar year from January to December.

[OAC rule 3745-77-07(C)(1)) and PTI P0117222] .

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. Any exceedances of the TDS content restriction of 4,200 ppm.

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

[OAC rule 3745-77-07(C)(1)) and PTI P0117222] .

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:



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a. Emission Limitation:

0.63 lb of PM10/hr

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in sections d)(1) and d)(2).

[OAC rule 3745-77-07(C)(1)) and PTI P0117222]

b. Emission Limitation:

2.76 tons of PM10/yr

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the monitoring and record keeping requirements specified in sections d)(3).

[OAC rule 3745-77-07(C)(1)) and PTI P0117222]

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)) and PTI P0117222]

g) Miscellaneous Requirements

(1) None.



11. Emissions Unit Group -AMU's: B008,B009,B010,

EU ID	Operations, Property and/or Equipment Description
B008	AMU - New Spin Tube Area
B009	AMU - Old Ransburg Area
B010	AMU - Middle of Upper Press Rm, N of 116 Press

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 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-11(B)(1)	See b)(2)b.
c.	OAC rule 3745-18-06(E)	exempt, pursuant to OAC rule 3745-18-06(C) [See b)(2)c.]

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, this emissions unit has a process weight rate of zero since per OAC rule 3745-17-11(A)(4) process weight rate does not include liquid or gaseous fuels. Therefore, Table I of OAC rule 3745-17-11 does not apply.

c. The process weight rate of this emissions unit is less than 1000 pounds/hr because natural gas is the only fuel fired in this emissions unit.

c) Operational Restrictions

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

[OAC rule 3745-77-07(A)(1)]



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d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



12. Emissions Unit Group -Boilers: B002,B003,B004,

EU ID	Operations, Property and/or Equipment Description
B002	Boiler 2
B003	Boiler 1
B004	Boiler 3

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 3745-17-07(A)	Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC 3745-17-10(B)(1)	0.020 lb PE per mmBtu of actual heat input
c.	OAC 3745-18-06(D)	1.6 lb SO ₂ per mmBtu of actual heat input.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The quality of oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs sulfur dioxide/mmBtu actual heat input.

Compliance with the above-mentioned specification shall be determined in accordance with the monitoring and recording keeping requirements in Section d)(1).

[OAC rule 3745-77-07(A)(1)]

(2) The permittee shall burn only natural gas, and/or #2 fuel oil in this emissions unit.

[OAC rule 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 "Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter" and D4294, "Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry", or equivalent methods as approved by the director.

[OAC rule 3745-77-07(C)(1)]

- (2) For each day during which the permittee burns a fuel other than natural gas, and/or #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[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, and/or #2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide limitation contained in this permit, based on the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

[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:



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- a. Emission Limitation: Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule

Applicable Compliance Method: If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance with the lb/mmBtu PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9)]

- c. Emission Limitation: 1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method: When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received or each daily sample collected during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon an average for the calendar month of the calculated sulfur dioxide emission rates for all of the shipments during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(A)]

- g) Miscellaneous Requirements

- (1) None.



13. Emissions Unit Group -Pyrolysis Furnaces (Group 1): N001,N002,N003,N004,

EU ID	Operations, Property and/or Equipment Description
N001	Pyrolysis Furnace #4
N002	Pyrolysis Furnace #6
N003	Pyrolysis Furnace #1
N004	Pyrolysis Furnace #2

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 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-09(B)	0.10 lb PE/100 lbs of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator
c.	OAC rule 3745-31-05 (A)(3) (PTI #03-9707 issued 7/31/96)	1.0 lb PE/hr [See b)(2)b.] 4.38 tons PE/yr Visible PE from this emissions unit shall not exceed 5% opacity, except for six minutes in any continuous sixty-minute period during which the opacity shall not exceed 10%. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09(B).

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

b. This emission limitation is equivalent to the emission limitation based on OAC rule 3745-17-09(B).



c) Operational Restrictions

- (1) The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-9707]

- (2) The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:
 - a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures.
 - b. the secondary chamber shall allow for a minimum retention time of 0.5 second at 1400 degrees Fahrenheit, taking into account normal start-up procedures.

[OAC rule 3745-77-07(A)(1) and PTI #03-9707]

- (3) The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:
 - a. the permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
 - b. prior to start-up of the furnace, the permittee shall remove ash residue left inside the furnace after the previous cycle;
 - c. during the automatic "water spray check", which is an integral part of the unit's start-up sequence, the operator shall walk to the front of the furnace, look inside, and visually verify that the water spray is functional, and if the water spray is not adequate or the nozzles are plugged, the permittee shall shut down the furnace and take the appropriate steps necessary to fix the problem before restarting the unit;
 - d. the permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
 - e. the permittee shall not process uncured paint or paint sludge, paint filter, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC, lead, plastisols, rubber-coated material, oil, wood, grease, trash, magnesium, oil filters, ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR Part 261, Subpart D in this furnace. Paint hooks covered with coatings that may contain chlorine (e.g. PVC), fluorine (e.g. Teflon),



or other elements of a corrosive nature which when combusted would deteriorate the furnace are also prohibited from being processed in this furnace.

[OAC rule 3745-77-07(A)(1) and PTI #03-9707]

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

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show emissions that are representative of normal operation for one operating quarter, the required frequency of visible emission checks may be reduced to weekly (once every week, when this emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates emissions that are not representative of normal operation, the frequency of emission checks shall revert back to daily until such time as there is one operating quarter of normal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]

(2) The permittee shall properly operate and maintain the monitoring devices associated with the furnace's safeguards and interlock system.

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]

(3) The permittee shall maintain an operation/maintenance log for this emissions unit. The log shall, at a minimum, contain the following information:

- a. the dates the emissions unit was in operation;
- b. the number of batches processed for each date the emissions unit was in operation;
- c. the date of any malfunction of the emissions unit water spray system and/or safeguards/interlocks, the corrective action taken, and the date it was completed; and



- d. the dates and descriptions of any additional maintenance activities performed on the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions were observed from this emissions unit and (b) describe any corrective action taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]

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 Limitations: 1.0 lb PE/hr and 0.10 lb PE/100 lbs of liquid, semi-solid or solid refuse and salvageable material charged to the incinerator

Applicable Compliance Method: If required, compliance with the PE limitation above shall be conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]

- b. Emission Limitation: 4.38 tons PE/yr

Applicable Compliance Method: The tons/yr limitation was developed by multiplying the lbs/hr limitation by 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/hr limitation, compliance shall also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]

- c. Emission Limitation: Visible PE from this emissions unit shall not exceed 5% opacity, except for six minutes in any continuous sixty-minute period during which the opacity shall not exceed 10%.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-9707]



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g) Miscellaneous Requirements

(1) None.



14. Emissions Unit Group -Pyrolysis Furnaces (Group 2): P023,P025,

EU ID	Operations, Property and/or Equipment Description
P023	Pyrolysis Furnace #5
P025	Pyrolysis Furnace #7

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 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-09(B)	See b)(2)a.
	OAC rule 3745-31-05(A)(3) (PTI #03-2677, issued 9/17/86)	0.13 lb PE/hr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

c) Operational Restrictions

(1) This emissions unit shall be operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying, with the manufacturer, that the change(s) would not adversely affect air contaminant emissions from the unit.

(2) The air contaminant control device (afterburner) serving this emissions unit shall be designed and operated in accordance with the following requirements:



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- a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1200 degrees Fahrenheit, taking into account the normal start-up procedures; and
 - b. the secondary combustion chamber shall allow for a minimum of 0.5 second retention time at 1200 degrees Fahrenheit, taking into account normal start-up procedures.
- (3) The permittee shall comply with the following operational restrictions:
- a. ensure that the pyrolysis furnace is operated only by properly trained personnel who have read, and understand, the furnace's operation manual;
 - b. prior to start-up of the furnace, remove ash residue left inside the furnace after the previous burn cycle;
 - c. during the automatic "water spray check", which is an integral part of the unit's start-up sequence, the operator shall walk to the front of the furnace, look inside, and visually verify that the water spray is functional, and if the water spray is not adequate or the nozzles are plugged, the permittee shall shut down the furnace and take the appropriate steps necessary to fix the problem before restarting the unit;
 - d. not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and
 - e. the permittee shall not process uncured paint or paint sludge, paint filter, waste powder from powder coating operations, nitrocellulose paints, solvents, thinners, PVC, lead, plastisols, rubber-coated material, oil, wood, grease, trash, magnesium, oil filters, ammunition, explosives, fertilizer, or any hazardous waste materials as defined in 40 CFR Part 261, Subpart D in this furnace. Paint hooks covered with coatings that may contain chlorine (e.g. PVC), fluorine (e.g. Teflon), or other elements of a corrosive nature which when combusted would deteriorate the furnace are also prohibited from being processed in this furnace.

[OAC rule 3745-77-07(A)(1) and PTI #03-2677]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of emissions;
 - b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If the daily checks show emissions that are representative of normal operation for one operating quarter, the required frequency of visible emission checks may be reduced to weekly (once every week, when this emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates emissions that are not representative of normal operation, the frequency of emission checks shall revert back to daily until such time as there is one operating quarter of normal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI #03-2677]

- (2) The permittee shall properly operate and maintain the monitoring devices associated with the furnace's safeguards and interlock system.

[OAC rule 3745-77-07(C)(1) and PTI #03-2677]

- (3) The permittee shall maintain an operation/maintenance log for this emissions unit. The log shall, at a minimum, contain the following information:

- a. the dates the emissions unit was in operation;
- b. the number of batches processed for each date the emissions unit was in operation;
- c. the date of any malfunction of the emissions unit water spray system and/or safeguards/interlocks, the corrective action taken, and the date it was completed; and
- d. the dates and descriptions of any additional maintenance activities performed on the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-2677]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective action taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1) and PTI #03-2677]



f) Testing Requirements

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

a. Emission Limitation: 0.13 lb PE/hr

Applicable Compliance Method: If required, compliance with the PE limitation above shall be conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-2677]

b. Emission Limitation: Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-2677]

g) Miscellaneous Requirements

(1) None.