



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

6/23/2015

Certified Mail

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

Facility ID: 0448011731
Permit Number: P0118026
County: Lucas

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 5/6/2015. 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 Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

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,

A handwritten signature in black ink that reads "Michael E. Hopkins". The signature is written in a cursive style.

Michael E. Hopkins, P.E
Assistant Chief Permitting Section, DAPC

Cc: Toledo Department of Environmental Services



Response to Comments

Facility ID:	0448011731
Facility Name:	FCA US LLC- Wrangler Paint Facility
Facility Description:	Paint Shop portion of Automotive and Light Duty Truck Assembly
Facility Address:	3800 Stickney Avenue Toledo, OH 43608 Lucas County
Permit:	P0118026, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 05/11/2015. The comment period ended on 06/10/2015.	
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: Emission unit group NG boilers: B301, B304

a. Comment:

This emission unit includes natural gas fired air make-up units that are identified as being subject to 40 CFR 63 Subpart DDDDD, the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters (i.e., Boiler MACT). FCA notes that within the Additional Terms and Conditions Section, item (2)(o) states the following:

- o. For each existing boiler a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:*
 - i. a visual inspection of the boiler system;*
 - ii. an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;*
 - iii. an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;*
 - iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;*
 - v. a review of the facility's energy management practices and recommendations for improvements*



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

FCA agrees that the identified requirements are applicable to the subject boilers (B301 and B304) however, there is additional language within the standard that has not been included in this section. Specifically, in Table 3 of 63.7500, the standard references the following with respect to energy assessments:

"A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement".

Rather than including all the various nuances of the Boiler MACT and to avoid potential conflicts between the rule language, the permit prescribed language and any changes that may occur to the standard in the future (note there are proposed revisions to the standard that are pending) FCA recommends that this section be revised as follows to state the following.

- ~~0. For each existing boiler a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must include the following:~~
- ~~i. a visual inspection of the boiler system;~~
 - ~~ii. an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;~~
 - ~~iii. an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;~~
 - ~~iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;~~
 - ~~v. a review of the facility's energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;~~
 - ~~vi. a list of cost effective energy conservation measures that are within the permittee's control;~~
 - ~~vii. a list of the energy savings potential of the energy conservation measures identified; and~~
 - ~~viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.~~

"For existing units, the permittee shall conduct a one-time energy assessment performed by a qualified energy assessor as required in Table 3 to subpart DDDDD of Part 63 – Work Practice Standards (40 CFR 63.7500(a)(1) Table 3-Subpart DDDDD)."

Response:

Ohio EPA agrees and the requested change has been made. An administrative PTI modification was also issued.

b. Comment:

Similar to the above comment, the draft Title V ROP includes the specifics of the boiler tune-up requirements as noted below:

- 1) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall include the following elements:



- a. inspection of the burner(s) (and requirement to clean or replace any necessary components);
- b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer’s specifications if applicable;
- c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;
- d. optimize total emissions of CO, in correlation with any applicable NO_x standards, consistent with the manufacturer’s specification if applicable;
- e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);
- f. maintain records of the tune-up, inspection, and any corrective actions taken; and
- g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.
- h. Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the applicable annual, biennial, or 5-year schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

FCA believes that including specific prescribed language from the regulation which has proposed revisions pending could pose conflicting language issues in the future. Alternatively, FCA believes the above should be replaced with the following language:

“For existing units, the permittee shall conduct a tune-up as required in Table 3 to subpart DDDDD of Part 63 – Work Practice Standards (40 CFR 63.7540(a)(10)(i) through (vi) Table 3 – Subpart DDDDD).”

Response:

Ohio EPA agrees and the requested change has been made.

2. Topic: Emission Unit Group – Off-line Repair Spray Booths – K404, K405

a. Comment:

In section (b) Applicable Emission Limitations or Control Requirements, the VOC emission limit is stated as 14.5 tons of volatile organic compounds (VOC) per year. FCA notes that in the Additional Terms and Conditions section in item (2)(f) and (2)(g) the limit is listed as 15.0 tons of VOC per rolling 12 month period.

FCA reviewed the original Title V permit for the facility issued in 2010 and believes the correct limit is 14.5 tons of VOC per year. FCA requests the following amendments to this section:

- f. The combined emissions from the operation of emissions units K404 and K405 shall not exceed ~~15.0~~ 14.5 tons of VOC per rolling, 12-month period.
- g. The maximum combined coating usage in the emissions units K404 and K405 shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$\del{15.0} 14.5 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$



1. Where:

Q_i = usage of coating material i , gallons

VOC_i = the mass of VOC (emitted) per volume of coating material i , pounds per gallon.

Response:

The 14.5 tons per year and the 15 tons per rolling, 12-month period are two separate emissions limits. The 14.5 tons per year is a BAT limit established under OAC rule 3745-31-05(A)(3) and applies to each emissions unit.

The 15.0 tons of VOC per rolling, 12-month period is an NSR emissions limit established under OAC rule 3745-31 21 through 27 on December 6, 2012 that covered both K404 and K405 collectively. When these emissions units were installed in 2004, Lucas County was not in attainment for ozone. It was determined that the facility would have to complete NSR review for VOC emissions. At that time, since controls were not a viable option for these emissions units, emissions would be limited with a cap on production. The cap was set at a static limit of 200,064 jobs per rolling, 12-month period. In 2012, the facility requested a different rate limit on emissions that did not involve a production limit. The change to the manner in which the NSR limit is calculated is based on the actual usage of coating material and the mass of VOC emitted by each material, with a maximum of 15.0 tons of VOC emitted per rolling, 12-month period. This change was established in PTI P0110183 issued 12/6/2012. This replaced the limit of 200,064 jobs per rolling, 12-month period. This change neither increased nor decreased the emissions; it just changed the manner in which it is calculated and tracked.

Based on this assessment, no changes will be made to the Title V permit. The limits are correct and based on current PTI permits for these emissions units (P0116662 issued 6/6/2014). If the facility would like to lower the NSR limit from 15.0 tons to 14.5 tons of VOC per rolling, 12-month period, they would need to submit a PTI application.



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for FCA US LLC- Wrangler Paint Facility

Facility ID:	0448011731
Permit Number:	P0118026
Permit Type:	Renewal
Issued:	6/23/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
FCA US LLC- Wrangler Paint Facility

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Draft Title V Permit
FCA US LLC- Wrangler Paint Facility
Permit Number: P0118206
Facility ID:0448011731

Effective Date:To be entered upon final issuance

Authorization

Facility ID: 0448011731
Facility Description: Paint Shop portion of Automotive and Light Duty Truck Assembly
Application Number(s): A0051602
Permit Number: P0118026
Permit Description: Renewal of Title V operating permit for Paint Shop portion of Automotive and Light Duty Truck Assembly
Permit Type: Renewal
Issue Date: 6/23/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0111964

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

FCA US LLC- Wrangler Paint Facility
3800 Stickney Avenue
Toledo, OH 43608

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

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

The above named entity is hereby granted a 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 Toledo Department of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
FCA US LLC- Wrangler Paint Facility
Permit Number: P0118206
Facility ID:0448011731
Effective Date:To be entered upon final issuance

A. Standard Terms and Conditions

2. 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))

3. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services unless otherwise specified.

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

4. 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))

5. 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))

6. 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))

7. 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))

8. 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))

9. 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))

10. 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))

11. 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))

12. 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))

13. 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))

14. 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 Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 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 Toledo Department of Environmental Services) 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))

15. 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))

16. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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))

17. 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))

18. 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))

19. 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.)

20. 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))

21. 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))

22. 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))

23. 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)

24. 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))

25. 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 Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 Toledo Department of Environmental Services. 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.)

26. 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.

27. 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))

28. 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 Toledo Department of Environmental Services 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).

29. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Toledo Department of Environmental Services must be notified in writing of any transfer of this permit.

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

30. 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.



31. 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 Toledo Department of Environmental Services, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
FCA US LLC- Wrangler Paint Facility
Permit Number: P0118206
Facility ID:0448011731
Effective Date:To be entered upon final issuance

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. Facility-wide restrictions on natural gas combustion established under the authority of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 27 in P0118026 as effective 12/30/2013:
 - a) Applicable Emissions Limitations:
 - (1) The combined emissions from the combustion of natural gas in emissions units B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - a. 35.49 tons of CO per rolling, 12-month period,
 - b. 21.13 tons of NO_x per rolling, 12-month period,
 - c. 0.81 ton of PE per rolling, 12-month period,
 - d. 3.22 tons of PM₁₀ per rolling, 12-month period,
 - e. 0.26 ton of SO₂ per rolling, 12-month period, and
 - f. 2.33 tons of VOC per rolling, 12-month period.
 - (2) These emission limitations were established for PTI purposes to reflect the potential to emit for emissions units B301, B303 through B310 and K301 through K303 while combusting a maximum 845 mmscf per year of natural gas. Therefore, if compliance is shown with the fuel usage limitation, compliance shall also be shown with the annual emission limitations.
 - b) Operational Restrictions
 - (1) The maximum annual natural gas usage for emissions units B301, B303 through B310 and K301 through K303 shall not exceed 845 mmscf, based upon a rolling, 12 month summation of the natural gas usage figures.

[Authority for term: OAC rule 3745-77-07(A)(1)]
 - (2) This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas usage, upon issuance of this permit.

[Authority for term: OAC rule 3745-77-07(A)(1)]
 - c) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of natural gas (in cubic feet) burned in all emissions units located at the paint shop facility. The monitoring equipment shall be installed, calibrated, operated, and

maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any amendments deemed necessary by the permittee.

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

- (2) The permittee shall maintain monthly records of the total quantity of natural gas (in cubic feet per month) burned in B301, B303 through B310 and K301 through K303.

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

- (3) The permittee shall maintain monthly records of the rolling, 12-month total quantity of natural gas (in cubic feet per rolling, 12-month period) burned in B301, B303 through B310 and K301 through K303.

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

d) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of all exceedances of the rolling, 12-month natural gas usage limitation, and the actual cumulative quantity of fuel burned for each such month.

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

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

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

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

e) Testing Requirements

- (1) Compliance with the Emissions Limitations specified in section 2.a) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

35.49 tons of CO per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit from emissions units B301, B303 through B310 and K301 through K303. Compliance may be demonstrated through calculations performed as follows:



multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98 (84 pounds of CO per million standard cubic), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

b. Emission Limitation:

21.13 tons of NO_x per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301, B303 through B310 and K301 through K303. Compliance may be demonstrated through calculations performed as follows:

multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98 (50 pounds of NO_x emissions per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

c. Emission Limitation:

0.81 ton of PE per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301, B303 through B310 and K301 through K303. Compliance may be demonstrated through calculations performed as follows:

multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (1.9 pounds of PE per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

d. Emission Limitation:

3.22 tons of PM₁₀ per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301, B303 through B310 and K301 through K303. Compliance may be demonstrated through calculations performed as follows:

Multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (7.6 pounds of PM₁₀ per million standard cubic feet), by



the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

e. Emission Limitation:

0.26 ton of SO₂ per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301, B303 through B310 and K301 through K303. Compliance may be demonstrated through calculations performed as follows:

multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (0.6 pound of SO₂ emissions per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

f. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301, B303 through B310 and K301 through K303. Compliance may be demonstrated through calculations performed as follows:

multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (5.5 pounds of VOC emissions per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

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

3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Dc: B301 and B304. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA.

[Authority for term: 40 CFR Part 60]

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart MM: K301, K302 and K303. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA.

[Authority for term: 40 CFR Part 60]



5. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 2 of Subpart IIII.

The following emissions units in this permit are subject to the aforementioned requirements: K301, K302, K303, K404, K405, P301, P302, and P304.

[Authority for term: 40 CFR Part 63]

6. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K301, K302, K303, K404, K405, P301, P302, and P304. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

[Authority for term: 40 CFR Part 63]

7. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD for B301 and B304. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016.

[40 CFR 63.6(b)(2)], [40 CFR 63.7485], [40 CFR 63.7490], and [40 CFR 63.7495]

8. The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.

[40 CFR Part 63, Subpart DDDDD]

9. The following boiler(s) is/are designed to only burn gas 1 fuels (subcategory) and therefore is/are not subject to the emission limits in Table 2 of the subpart or the operating limits in Table 4 to the subpart. However, the boiler(s) is/are subject to tune-ups requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart; and the existing boilers must be included in the one-time energy assessment, performed in accordance with Table 3 #4 of the subpart:

B301 and B304

[40 CFR 63.7500(e)] and [40 CFR 63.7540(a)(10) through (13)]



10. The Ohio EPA has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit K303. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR Part 64]

11. 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, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

P307 – 232 hp emergency electrical generator, PBR08110, OAC rule 3745-31-03(A)(4)(b)

P308 – 232 hp emergency electrical generator, PBR08110, OAC rule 3745-31-03(A)(4)(b)

P309 – 232 hp emergency electrical generator, PBR08110, OAC rule 3745-31-03(A)(4)(b)



Draft Title V Permit
FCA US LLC- Wrangler Paint Facility
Permit Number: P0118206
Facility ID:0448011731
Effective Date:To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. B303, Topcoat 1&2 A&B ASH, Paint Mix ASH, Office ASH 1-3

Operations, Property and/or Equipment Description:

Eight natural-gas fired air make up units (<10 mmBtu/hr each) total capacity of 28.95 mmBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI P0116525, issued 4/2/2014)	Combined emissions from the stacks serving this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu, 2.4 pounds CO per hour, 10.5 tons of CO per year, 2.5 pounds of nitrogen oxides (NO _x) per hour, 10.95 tons of NO _x per year, 0.06 pound of particulate emissions (PE) per hour, 0.24 ton of PE per year, 0.22 pound of particulate emissions less than 10 microns in diameter (PM ₁₀) per hour, 0.95 ton of PM ₁₀ per year, 0.0006 pound sulfur dioxide (SO ₂) per mmBtu, 0.02 pound of SO ₂ per hour, 0.076 ton of SO ₂ per year, 0.16 pound of volatile organic compounds (VOC) per hour, 0.68 ton of VOC per year, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-17-07(A)(1)	See b)(2)d.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)d.
d.	OAC rule 3745-18-06(A)	See b)(2)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(D)	See b)(2)f. and b)(2)g.
f.	OAC rule 3745-31-10 through 20 (PTI P0116625 issued 4/2/2014)	Emissions from the stacks serving this emissions unit shall not exceed: 0.085 pound NO _x per mmBtu, 0.0019 pound of PE per mmBtu, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)f. and b)(2)h.
g.	OAC rule 3745-31-21 through 27 (PTI P0116625 issued 4/2/2014)	Emissions from the stacks serving this emissions unit shall not exceed: 0.085 pound NO _x per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)f. and b)(2)i.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 27.
- c. The emission limitations above were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, provided natural gas is the only fuel utilized in this emissions unit, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment when this emissions unit employs only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

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



Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exist as part of the federally-approved SIP for Ohio.

- f. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- g. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 35.49 tons of CO per rolling, 12-month period, and
 - ii. 0.26 ton of SO₂ per rolling, 12-month period.
- h. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period,
 - ii. 0.81 ton of PE per rolling, 12-month period, and
 - iii. 3.22 tons of PM₁₀ per rolling, 12-month period.
- i. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period, and
 - ii. 2.33 tons of VOC per rolling, 12-month period.
- c) **Operational Restrictions**
 - (1) The permittee shall burn only natural gas in this emissions unit.
[Authority for term: 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 a record of the type and quantity of fuel burned in this emissions unit.
[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average

Applicable Compliance Method:

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

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

- b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



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

c. Emission Limitation:

2.4 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (28.95 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

d. Emission Limitation:

10.5 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (28.95 mmBtu per hour) by the allowable emission limitation (0.083 pound of CO per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

e. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 50 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



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

f. Emission Limitation:

2.5 pounds of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (28.95 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

g. Emission Limitation:

10.95 tons of NO_x per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (28.95 mmBtu per hour) by the allowable emission limitation (0.085 pound of NO_x per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

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

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



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

i. Emission Limitation:

0.06 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (28.95 mmBtu per hour).

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

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

j. Emission Limitation:

0.24 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (28.95 mmBtu per hour) by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

k. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu

Applicable Compliance Method:

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

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



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

I. Emission Limitation:

0.22 pound of PM₁₀ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (28.95 mmBtu per hour).

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

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

m. Emission Limitation:

0.95 ton of PM₁₀ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (28.95 mmBtu per hour) by the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

n. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



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

o. Emission Limitation:

0.02 pound of SO₂ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (28.95 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

p. Emission Limitation:

0.076 ton of SO₂ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (28.95 mmBtu per hour) by the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

q. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

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

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



procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

r. Emission Limitation:

0.16 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (28.95 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

s. Emission Limitation:

0.68 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (28.95 mmBtu per hour) by the allowable emission limitation (0.0054 pound of VOC per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

t. Emission Limitation:

The emissions from the combustion of natural gas in B301, B303 through B310, and K301 through K303 shall not exceed the following:

- 35.49 tons of CO as a rolling, 12-month period
- 21.13 tons of NO_x as a rolling, 12-month period
- 3.22 tons of PM₁₀ as a rolling, 12-month period
- 0.81 tons of PE as a rolling, 12-month period
- 0.26 tons of SO₂ as a rolling, 12-month period
- 2.33 tons of VOC as a rolling, 12-month period



Draft Title V Permit
FCA US LLC- Wrangler Paint Facility
Permit Number: P0118206
Facility ID:0448011731
Effective Date:To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in B.2.c) and the emissions factors demonstrated in B.2.e) of the permit.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

- g) Miscellaneous Requirements
 - (1) None.



2. K301, E-Coat

Operations, Property and/or Equipment Description:

Electrodeposition (E-Coat) prime coat of Automobile and/or Light Duty Trucks with regenerative thermal oxidizer (RTO) on oven exhaust

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

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
electrodeposition prime coat (E-Coat) tank and E-coat oven (coating emissions)		
a.	OAC rule 3745-31-05(A)(3) (P0118315 effective 2/12/2015)	Emissions from the coatings utilized in this emissions unit shall not exceed: 0.27 pound of volatile organic compounds (VOC) per hour, 1.2 tons of VOC per year, and see b)(2)a. through b)(2)d.
b.	OAC rule 3745-21-09(C)(1)(a)(i)	See b)(2)e.
c.	OAC rule 3745-31-21 through 27 (P0118315 effective 2/12/2015)	See b)(2)f. through b)(2)h.
d.	40 CFR Part 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)i.
e.	40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant prime coat operation subject to the emission limitations/control measures specified in this section.	The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart MM. See b)(2)e. and b)(2)j. [60.392(b)]
f.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)k.
g.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176)	See b)(2)l. [63.3091(a) and (b)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	
14.05 mmBtu per hour direct fired low NOx natural gas E-coat oven burners (combustion emissions)		
h.	OAC rule 3745-31-05(A)(3) (P0118315 effective 2/12/2015)	Emissions from the oven burners utilized in this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu, 1.2 pounds of CO per hour, 5.1 tons of CO per year, 1.2 pounds of nitrogen oxides(NO _x) per hour, 5.3 tons of NO _x per year, 0.03 pound of particulate emissions (PE) per hour, 0.12 ton of PE per year, 0.11 pound of particulate emissions less than 10 microns in diameter (PM ₁₀) per hour, 0.46 ton of PM ₁₀ per year, 0.0006 pound of sulfur dioxide (SO ₂) per mmBtu, 0.009 pound of SO ₂ per hour, 0.04 ton of SO ₂ per year, 5% opacity as a 6-minute average, and see b)(2)m. and b)(2)n.
i.	OAC rule 3745-17-07(A)(1)	see b)(2)e.
j.	OAC rule 3745-17-11(B)(1)	see b)(2)o.
k.	OAC rule 3745-18-06(A)	see b)(2)e. and b)(2)p.
l.	OAC rule 3745-31-05(D) (P0118315 effective 2/12/2015)	see b)(2)q. and b)(2)r.
m.	OAC rule 3745-31-10 through 20 (P0118315 effective 2/12/2015)	Emissions from the oven burners utilized in this emissions unit shall not exceed: 0.085 pound of NO _x per mmBtu, 0.0019 pound of PE per mmBtu, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)q. and b)(2)s.
n.	OAC rule 3745-31-21 through 27 (P0118315 effective 2/12/2015)	Emissions from the oven burners utilized in this emissions unit shall not exceed: 0.085 pound of NO _x per mmBtu, and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see b)(2)q. and b)(2)t.
touch up booth controlled by a dry filtration device		
o.	OAC rule 3745-31-05(A)(3) (P0118315 effective 2/12/2015)	Emissions from the stack serving this emissions unit shall not exceed: 0.05 ton of VOC per year, 5% opacity as a 6-minute average, and see b)(2)u. and b)(2)v.
p.	OAC rule 3745-17-07(B)(1)	see b)(2)e.
q.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
r.	OAC rule 3745-21-09(C)(1)(a)(i)	see b)(2)e.
s.	OAC rule 3745-31-10 through 20 (P0118315 effective 2/12/2015)	Emissions from the stack serving this emissions unit shall not exceed: 0.01 pound of PE per hour, 0.05 ton of PE per rolling, 12-month period, 0.01 pound of PM ₁₀ per hour, 0.05 ton of PM ₁₀ per rolling 12-month period and see b)(2)w.
t.	OAC rule 3745-31-21 through 27 (P0118315 effective 2/12/2015)	0.01 pound of VOC per hour, and see b)(2)f. through b)(2)h.
u.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)k.
v.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)l. [63.3091(a) and (b)]
14.0mmBtu/hr natural gas fired regenerative thermal oxidizer (RTO) shared by K301 and K303 (combustion emissions)		
w.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01) (P0118315 effective 2/12/2015)	Emissions from the RTO burners utilized in this emissions unit shall not exceed: 1.16 pounds of CO per hour, 5.11 tons of CO per year, 1.19 pounds of nitrogen oxides (NO _x) per hour, 5.24 tons of NO _x per year, 0.03 pound of PE per hour,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.13 ton of PE per year, 0.11 pound of PM ₁₀ per hour, 0.50 ton of PM ₁₀ per year, 0.009 pound of SO ₂ per hour, 0.04 ton of SO ₂ per year, 0.084 pound of VOC per hour, 0.37 ton of VOC per year, 5% opacity as a 6 minute average, and see b)(2)n. and b)(2)x.
x.	OAC rule 3745-31-05(A)(3)(a)ii (as effective 12/01/06) (P0118315 effective 2/12/2015)	See b)(2)y.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 27, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart IIII.
- b. The hourly VOC emission limitation above was established for PTI purposes to reflect the controlled potential to emit for this emissions unit based on the worst case operating scenario (82 jobs/hour). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. The permittee shall operate and maintain a thermal oxidizer, with 100% capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the E-coat dip tank and e-coat oven. The thermal oxidizer shall be installed, operated and maintained in accordance with the manufacturer's recommendations with any amendments deemed necessary by the permittee.
- d. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the oxidizer is in operation as a VOC control device for compliance purposes, shall not be below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- f. The maximum coating usage in the dip tank, drying oven and touch up booth operations associated with the E-coat line shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$2.1 \text{ tons VOC} \geq (1 - \mu) \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i , gallons of applied coating solids

VOC_i = the mass of VOC (emitted) per volume of coating material i , pounds per gallon of applied coating solids.

μ = the overall capture and control efficiency for the control equipment stated as a decimal fraction

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- g. The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line shall not exceed 0.04 pound of volatile organic compounds per gallon of applied coating solids as a volume-weighted average on a monthly basis.
- h. The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line (K301), shall not exceed 2.1 tons as a rolling, 12-month summation.
- i. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- j. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- k. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- l. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and

glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 1.32 kilograms per liter (1.10 pounds per gallon) of coating solids deposited during each month, determined according to the requirements in 63.3173.

- m. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 27.
- n. The hourly and annual emission limitations above were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- o. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- p. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

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

- q. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- r. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- i. 35.49 tons of CO per rolling, 12-month period, and
- ii. 0.26 ton of SO₂ per rolling, 12-month period.
- s. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period,
 - ii. 0.81 ton of PE per rolling, 12-month period, and
 - iii. 3.22 tons of PM₁₀ per rolling, 12-month period.
- t. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period, and
 - ii. 2.33 tons of VOC per rolling, 12-month period.
- u. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 27 and 40 CFR Part 63 Subparts A and IIII.
- v. The permittee shall permit no visible emissions of fugitive dust from the enclosure serving the touch up booth.
- w. The permittee shall operate and maintain a fabric filtration system with a minimum of 98% overall control efficiency, to control particulate emissions from the touch up booth.
- x. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- y. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the thermal oxidizer combustion emissions of carbon monoxide (CO), nitrogen oxides (NO_x), particulate (PE), particulate matter less than or equal to 10 microns in diameter (PM₁₀), sulfur dioxide (SO₂), and volatile organic



compound (VOC) from this air contaminant source since the uncontrolled potential to emit for CO, NO_x, PE, PM₁₀, PM_{2.5}, SO₂, and VOC is less than 10 tons per year.

c) Operational Restrictions

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

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

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

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

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

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

- (3) All of the operations comprising this emissions unit shall be fully enclosed and the emissions from the E-coat tank and the drying oven shall be exhausted through a thermal oxidizer.

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

- (4) The permittee shall operate the thermal oxidizer whenever the respective emission source is in operation.

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

- (5) All of the equipment comprising the touch up booth shall be fully enclosed and all emissions shall be exhausted through a dry filtration device.

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

- (6) The permittee shall operate the dry filtration device whenever the respective emission source is in operation.

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

- (7) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.393(b)	Requirement to demonstrate compliance monthly
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(A)(1)]

- (8) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3092(a)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from operating limits
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3174	Requirements for a capture system and control device which is not utilized to meet the Subpart IIII emission limitations
If control is required for compliance:	
63.3092(b)	Alternate electrodeposition primer system requirements
63.3093(b)	Requirement for meeting operating limitations specified in Table 1
63.3093(c)	Alternate requirements for operating limitations specified in Table 1
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a) through (c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3100(f)	Startup, shutdown and malfunction plan
63.3163(a) through (j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3173(a) through (c)	Alternate continuous compliance demonstration

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when this emissions unit was in operation.

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

- (3) The permittee shall operate and maintain (a) continuous temperature monitor(s) and recorder(s) which measures and records the combustion temperature within the thermal oxidizer when the oxidizer is in operation. The monitoring and recording devices shall

be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any amendments deemed necessary by the permittee and approved by the Ohio EPA.

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

- (4) The permittee shall collect and record the following information for each month for the e-coat dip tank, e-coat oven, touch up booth and the associated control equipment:
- a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (in mass of VOC per volume of applied coating solids) or the monthly volume-weighted average VOC content (in mass of VOC per volume of applied coating solids) of all the coatings;
 - d. the calculated, controlled VOC emission rate, in mass of VOC per volume of applied coating solids. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the monthly volume-weighted VOC content recorded in accordance with d)(4)c. above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - e. the total VOC emissions from all coatings utilized in the dip tank, drying oven and touch up booth operations associated with the E-coat line, $(1 - \mu) \sum_{i=1}^n (Q_i)(VOC_i) \div 2000$ pounds/ton, in tons per month;
 - f. the rolling, 12-month summation of VOC emissions from the dip tank, drying oven and touch up booth operations associated with the E-coat line, in tons per year.
 - g. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - h. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-21-09(B)(3)(f),(l)]

- (5) The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months of operation after issuance of this permit

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



- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.393(c)	Procedures for the monthly compliance demonstration
60.394(a) through (c)	Requirements for incinerator temperature monitoring equipment
60.395(b)	Quarterly/semiannual emissions exceedance recordkeeping requirements
60.395(c)	Thermal incinerator temperature recording requirements

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

- (7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
If control is required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(i)	Recordkeeping requirements related to M204 PTE determination
63.3130(k)	Record retention for control device performance testing
63.3130(l)	Recordkeeping requirements related operating limits
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
63.3168(a)	Requirements for operation, and maintenance of CPMS
63.3168(b)	Requirements for control device by-pass monitoring
63.3168(c)	Requirements for thermal oxidizer monitoring
63.3168(g)	Requirements for capture system monitoring
63.3169	Requirements for capture and control device which are not taken into account when demonstrating compliance with the applicable emission limitations



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

e) Reporting Requirements

- (1) The permittee shall notify the Director of any record showing that the volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify each day when the dry filtration system was not in service.

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

- (4) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(m)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month of the calendar quarter during which the calculated, controlled VOC emission rate, in pounds mass of VOC per gallon volume of applied coating solids, exceeded the emissions limitation and the actual VOC emission rate for each such period.

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

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

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

- (7) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.395(b)	Quarterly/semiannual emissions exceedance reporting requirements
60.395(c)	Thermal incinerator temperature reporting requirements
60.395(d)	M25 30-day notification requirements



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

- (9) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
If control is required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3120(b)	Performance test report requirements
63.3120(c)	Startup, shutdown and malfunction report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(c)	Requirement for deviation reporting for operating parameters
63.3163(d)	Requirement for deviation reporting for control bypass
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation during a period of startup, shutdown, or malfunction

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

- (10) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

- (1) Compliance with the emission limitation(s) for the coating emissions shall be determined in accordance with the following methods(s):

a. Emission Limitation:

0.27 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.0033 pound VOC per job). If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



b. Emission Limitation:

1.2 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the maximum hourly emissions rate (0.27 pound of VOC per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

c. Emission Limitation:

The combined emissions of VOC from the E-coat line shall not exceed 0.04 pound of volatile organic compounds per gallon of applied coating solids as a volume-weighted average on a monthly basis.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line (K301), shall not exceed 2.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

100% capture efficiency and a minimum of 95 percent control efficiency



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR Part 60 Appendix A and Method 204 of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternate if such approval does not contravene any other applicable requirement.)

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

- (2) Compliance with the emission limitation(s) for the E-Coat oven burner combustion emissions shall be determined in accordance with the following methods(s):

- a. Emission Limitation;

5% opacity, as a six-minute average

Applicable Compliance Method;

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:

1.2 pounds of CO per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

5.1 tons of CO per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners and 8760 hours per year, and then dividing by 2000 pounds per ton.

e. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 50 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

1.2 pounds of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

5.23 tons of NO_x per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners and 8760 hours per year, and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

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

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

i. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners.

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



j. Emission Limitation:

0.12 ton of PE per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the 14.05 mmBtu heat input capacity of the E-coat oven burners by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

k. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

l. Emission Limitation:

0.11 pound of PM₁₀ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

m. Emission Limitation:

0.46 ton of PM₁₀ per year



Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the 14.05 mmBtu heat input capacity of the E-coat oven burners by the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

n. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

o. Emission Limitation:

0.009 pound of SO₂ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the 14.05 mmBtu per hour heat input capacity of the E-coat oven burners.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

p. Emission Limitation:

0.04 ton of SO₂ per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by



multiplying the hourly maximum heat input (14.05 mmBtu per hour) by the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

q. Emission Limitation:

The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- 35.49 tons of CO as a rolling, 12-month summation
- 21.13 tons of NO_x as a rolling, 12-month summation
- 0.81 ton of PE as a rolling, 12-month summation
- 3.22 tons of PM₁₀ as a rolling, 12-month summation
- 0.26 ton of SO₂ as a rolling, 12 month summation
- 2.33 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section B.2.of this permit.

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

(3) Compliance with the emission limitation(s) for the touch up booth shall be determined in accordance with the following methods(s):

a. Emission Limitation;

5% opacity, as a six-minute average

Applicable Compliance Method;

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation;

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



c. Emission Limitation:

98% control of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through emissions testing at the inlet and outlet of the control device performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emissions Limitation:

0.01 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

0.05 ton of PE per rolling 12-month period

Applicable Compliance Method:

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

$(625 \text{ gallons of coating applied per rolling, 12-month period})(15.0 \text{ pounds per gallon of coating})(80\% \text{ solids by weight})(1 - 35\% \text{ transfer efficiency})] (1-0.98 \text{ overall control efficiency}) \div 2000 \text{ pounds per ton} = 0.05 \text{ ton of PE per rolling, 12-month period.}$

f. Emission Limitation:

0.01 pound of PM₁₀ per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- g. Emission Limitation:

0.05 ton of PM₁₀ per rolling 12-month period.

Applicable Compliance Method:

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

(625 gallons of coating applied per rolling, 12-month period)(15.0 pounds per gallon of coating)(80% solids by weight)(1 - 35% transfer efficiency)] (1-0.98 overall control efficiency) ÷ 2000 pounds per ton = 0.05 ton of PM₁₀ per rolling 12-month period.
- h. Emissions Limitation:

0.01 pound of VOC per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- i. 0.05 ton of VOC per rolling 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the hourly allowable emission limitation (0.01 pound of VOC per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]
- (4) Compliance with the combined emission limitation(s) in accordance with 40 CFR Part 60, Subpart MM shall be determined in accordance with the following methods(s):

 - a. Emission Limitation:

0.17 kilogram of VOC per liter of applied coating solids when R_T is 0.16 or greater, 0.17×350(0.160-R_T) kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160 and when R_T is less than 0.040, there is no emission limit



Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 60.393 through 60.396. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

- (5) Compliance with the combined emission limitation(s) in accordance with 40 CFR Part 63, Subpart IIII shall be determined in accordance with the following methods(s):

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kg/liter (1.10 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

- (6) Compliance with the combined emission limitation(s) for the thermal oxidizer combustion emissions shall be determined in accordance with the following methods(s):

a. Emission Limitation;

5% opacity, as a six-minute average.

Applicable Compliance Method;

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



- b. Emission Limitation:

1.16 pounds of CO per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:

5.11 tons of CO per year.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario; multiplying the allowable emission limitation (1.16 pounds of CO per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

- d. Emission Limitation:

1.19 pounds of NO_x per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. Emission Limitation:

5.24 tons of NO_x per year.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario; multiplying the allowable emission limitation (1.19 pounds of NO_x per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

- f. Emission Limitation:

0.03 pound of PE per hour.



Applicable Compliance Method:

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

- g. 0.13 ton of PE per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.03 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

- h. Emission Limitation:

0.11 pound of PM₁₀ per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- i. Emission Limitation:

0.50 ton of PM₁₀ per year.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario; multiplying the allowable emission limitation (0.11 pound of PM₁₀ per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

- j. Emission Limitation:

0.009 pound of SO₂ per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- k. Emission Limitation:
0.04 ton of SO₂ per year.
Applicable Compliance Method:
Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit; multiplying the allowable emission limitation (0.019 pound of SO₂ per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.
- l. Emission Limitation:
0.084 pound of VOC per hour.
Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- m. Emission Limitation:
0.37 ton of VOC per year.
Applicable Compliance Method:
This emission limitation was developed by multiplying the allowable emission limitation (0.084 pound of VOC per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

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

- (7) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. the emission testing shall be conducted within 12 months after permit issuance and at least once every 5 years thereafter;
 - b. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA;
 - c. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Ohio EPA;
 - d. the control efficiency (i.e., the percent reduction in mass emissions of VOC between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part

60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternate, equivalent methods may be used upon approval by the Ohio EPA;

- e. the permittee shall collect, record, and include in the test report the 3-hour average combustion temperature within the thermal incinerator during testing; and
- f. the permittee shall collect, record, and include in the test report the monitoring parameters established to demonstrate that the emissions unit is in compliance with the 100 percent capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

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

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

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

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

g) **Miscellaneous Requirements**

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

3. K302, Powder Anti-Chip

Operations, Property and/or Equipment Description:

Electrostatic powder anti-chip primer surfacer with inherent control by particulate filtration for overspray, discharging within building

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

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	electrostatic powder anti-chip guidecoat spray booth with inherent control by high efficiency particulate filtration system	
a.	OAC rule 3745-31-05(A)(3) (P0116596, effective 4/7/2014)	0.01 pound per hour of particulate emissions (PE), 0.01 pound of particulate emissions less than 10 microns in diameter (PM ₁₀) per hour, 5% opacity as a 6-minute average from any stack serving this emissions unit, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-10 through 20 (P0116596, effective 4/7/2014)	98% control efficiency for particulate, 0.05 ton of PE per rolling, 12-month period, 0.05 ton of PM ₁₀ per rolling, 12-month period, and see b)(2)c.
c.	OAC rule 3745-17-07(B)(1)	see b)(2)d.
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.
e.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)f.
f.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation	see b)(2)g. [63.3091(a) and (b)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	
electrostatic powder anti-chip oven with no control		
g.	OAC rule 3745-31-05(A)(3) (P0116596, effective 4/7/2014)	1.7 pounds per hour of volatile organic compounds (VOC), and see b)(2)h. and b)(2)i.
h.	OAC rule 3745-31-21 through 27 (P0116596, effective 4/7/2014)	0.05 pound of VOC per gallon of applied coating solids as a monthly volume-weighted average, 2.0 tons of VOC per rolling, 12-month period, and see b)(2)j.
i.	OAC rule 3745-21-09(C)(1)(b)	see b)(2)d.
j.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)k.
k.	40 CFR Part 60 Subpart MM (60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant guide coat operation subject to the emission limitations/control measures specified in this section.	see b)(2)d. [60.392(b)]
l.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)f.
m.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	see b)(2)g. [63.3091(a) and (b)]
14.05 mmBtu per hour direct fired natural gas low NOx anti-chip oven burners		
n.	OAC rule 3745-31-05(A)(3) (P0116596, effective 4/7/2014)	the emissions from the oven stack(s) serving this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu,



Effective Date:To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.2 pounds of CO per hour, 5.1 tons of CO per year, 1.2 pounds of nitrogen oxides (NO _x) per hour, 5.23 tons of NO _x per year, 0.03 pound of PE per hour, 0.13 ton of PE per year, 0.11 pound of PM ₁₀ per hour, 0.46 ton of PM ₁₀ per year, 0.0006 pound of sulfur dioxide (SO ₂) per mmBtu, 0.009 pound of SO ₂ per hour, 0.04 ton of SO ₂ per year, 0.08 pound of VOC per hour, 0.33 ton of VOC per year, 5% opacity as a 6-minute average, and see b)(2)l. and m.
o.	OAC rule 3745-31-05(D) (P0116596, effective 4/7/2014)	see b)(2)n. and b)(2)o.
p.	OAC rule 3745-31-10 through 20 (P0116596, effective 4/7/2014)	the emissions from the oven stack(s) serving this emissions unit shall not exceed: 0.085 pound of NO _x per mmBtu, 0.0019 pound per mmBtu of PE, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)n and b)(2)p.
q.	OAC rule 3745-31-21 through 27 (P0116596, effective 4/7/2014)	the emissions from the oven stack(s) serving this emissions unit shall not exceed: 0.085 pound of NO _x per mmBtu, 0.0054 pound of VOC per mmBtu, and see b)(2)n. and b)(2)q.
r.	OAC rule 3745-17-07(A)(1)	see b)(2)d.
s.	OAC rule 3745-17-11(B)(1)	see b)(2)r.
t.	OAC rule 3745-18-06(A)	see b)(2)s.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20, 40 CFR Part 63, Subparts A and IIII.
- b. There shall be no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while utilizing an inherent fabric filtration

system. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. The permittee shall employ reasonably available control measures on the powder guidecoat operations associated with this emissions unit for the purpose of ensuring compliance with the applicable requirements. The permittee has committed to utilize inherent fabric filtration and adequate enclosure to minimize or eliminate visible particulate emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. Implementation of these control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B), (B)(3).
- f. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- g. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 1.32 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

- h. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 through 27, 40 CFR Part 60, Subparts A and MM, and 40 CFR Part 63 Subparts A and IIII.
- i. The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to

develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

- j. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$2.0 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i , gallons of applied coating solids
 VOC_i = the mass of VOC (emitted) per volume of coating material i , pounds per gallon of applied coating solids.

- k. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- l. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 27.
- m. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- n. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- o. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 35.49 tons of CO per rolling, 12-month period, and
 - ii. 0.26 ton of SO₂ per rolling, 12-month period.
- p. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period,
 - ii. 0.81 ton of PE per rolling, 12-month period, and
 - iii. 3.22 tons of PM₁₀ per rolling, 12-month period.
- q. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- i. 21.13 tons of NO_x per rolling, 12-month period, and
- ii. 2.33 tons of VOC per rolling, 12-month period.
- r. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- s. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

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

c) Operational Restrictions

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

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

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

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

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

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



- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.393(b)	Requirement to demonstrate compliance monthly
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(A)(1)]

- (4) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3092(a)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from operating limits
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3174	Requirements for a capture system and control device which is not utilized to meet the Subpart IIII emission limitations
If control is required for compliance:	
63.3092(b)	Alternate electrodeposition primer system requirements
63.3093(b)	Requirement for meeting operating limitations specified in Table 1
63.3093(c)	Alternate requirements for operating limitations specified in Table 1
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a) through (c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3100(f)	Startup, shutdown and malfunction plan
63.3163(a) through (j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3173(a) through (c)	Alternate continuous compliance demonstration

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

d) Monitoring and/or Recordkeeping Requirements

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

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



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

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

- (3) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:
 - a. the company identification for each coating utilized;
 - b. the volume of each coating applied during the month, Q_i , in gallons of applied coating solids;
 - c. the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon of applied coating solids;
 - d. the total VOC emissions from all coatings utilized, in tons; $\sum_{i=1}^n(Q_i)(VOC_i) \div 2000$ pounds/ton), in tons per month;
 - e. the rolling, 12-month summation of VOC emissions, in tons per year.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

- (4) The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

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

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.393(c)	Procedures for the monthly compliance demonstration
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]



- (6) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
If control is required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(i)	Recordkeeping requirements related to M204 PTE determination
63.3130(k)	Record retention for control device performance testing
63.3130(l)	Recordkeeping requirements related operating limits
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
63.3168(a)	Requirements for operation, and maintenance of CPMS
63.3168(b)	Requirements for control device by-pass monitoring
63.3168(c)	Requirements for thermal oxidizer monitoring
63.3168(g)	Requirements for capture system monitoring
63.3169	Requirements for capture and control device which are not taken into account when demonstrating compliance with the applicable emission limitations

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
- (2) The permittee shall notify the Director (Ohio EPA) of any daily record showing that the use of noncomplying coatings (any coating with VOC emissions greater than 0.05 pound per gallon of applied coating solids). The notification shall include a copy of such record and shall be sent to the Director within thirty days following the end of the calendar month.



- (3) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e., $(\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 2.0$ tons in any rolling, 12-month period.
- (4) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.395(b)	Quarterly emissions exceedance reporting requirements
60.395(d)	M25 30-day notification requirements

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

- (6) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

If control is not required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
If control is required for compliance:	
63.3120(a)	Semiannual compliance report content
63.3120(b)	Performance test report requirements
63.3120(c)	Startup, shutdown and malfunction report content
63.3163(b)	Requirement for deviation reporting for emissions
63.3163(c)	Requirement for deviation reporting for operating parameters
63.3163(d)	Requirement for deviation reporting for control bypass
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator's determination of violation during a period of startup, shutdown, or malfunction

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Compliance with the emission limitation(s) for the powder spray booth stack shall be determined in accordance with the following methods(s):



- i. Emission Limitation:

5% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- ii. Emission Limitation;

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- iii. Emission Limitation:

98% control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system).

Applicable Compliance Method:

If required, compliance shall be determined with the test methods and procedures specified in 3745-17-03(B)(10), or an alternative test protocol or demonstration approved by the Ohio EPA.

- iv. Emission Limitation:

0.01 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



v. Emission Limitation:

0.05 ton of PE per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable emission limitation (0.01 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

vi. Emission Limitation:

0.01 pound per hour PM₁₀

Applicable Compliance Method:

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

vii. Emission Limitation:

0.05 ton of PM₁₀ per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable emission limitation (0.01 pound of PM₁₀ per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

b. Compliance with the emission limitation(s) for the oven stack shall be determined in accordance with the following methods(s):

i. Emission Limitation:

0.05 pound of VOC per gallon of applied coating solids as a monthly volume-weighted average

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2)b. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



ii. Emission Limitation:

1.7 pounds per hour VOC

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a one-time calculation of the worst case operating scenario (82 jobs per hour) and a company supplied emissions factor (0.02 pound VOC per job).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

iii. Emission Limitation:

2.0 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3)e. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. Emission Limitation in accordance with OAC rule 3745-21-09(C)(1)(b):

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

Applicable Compliance Method:

If required, the permittee shall use the procedures in OAC rule 3745-21-09(B)(3)(f) for determining the monthly volume-weighted average mass of VOC emitted per volume of coatings. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis.

Applicable Compliance Method:

If required, the permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.



- vi. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- vii. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pounds per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- c. Compliance with the emission limitation(s) for the oven burners shall be determined in accordance with the following methods(s):
 - i. Emission Limitation;

5% opacity, as a six-minute average

Applicable Compliance Method;

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

 - ii. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iii. Emission Limitation:

1.2 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

iv. Emission Limitation:

5.1 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

v. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 50 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

vi. Emission Limitation:

1.2 pounds of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

vii. Emission Limitation:

5.23 tons of NO_x per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

viii. Emissions Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and



procedures specified in OAC rule 3745-17-03(B)(10), or other USEPA approved test method, with prior approval from the Ohio EPA

ix. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

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

x. Emission Limitation:

0.13 ton of PE per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.03 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xi. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu

Applicable Compliance Method:

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

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



xii. Emission Limitation:

0.11 pound of PM₁₀ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

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

xiii. Emission Limitation:

0.46 ton of PM₁₀ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xiv. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04 or other USEPA approved test methods, with prior approval from the Ohio EPA.



xv. Emission Limitation:

0.009 pound of SO₂ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04, or other USEPA approved test method, with prior approval from the Ohio EPA.

xvi. Emission Limitation:

0.04 ton of SO₂ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xvii. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pounds of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10, or other USEPA approved test method, with prior approval from the Ohio EPA.



xviii. Emission Limitation:

0.08 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10, or other USEPA approved test method, with prior approval from the Ohio EPA.

xix. Emission Limitation:

0.33 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound per mmBtu VOC) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xx. Emission Limitation:

The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- 35.49 tons of CO as a rolling, 12-month summation
- 21.13 tons of NO_x as a rolling, 12-month summation
- 0.81 ton of PE as a rolling, 12-month summation
- 3.22 tons of PM₁₀ as a rolling, 12-month summation
- 0.26 ton of SO₂ as a rolling, 12 month summation
- 2.33 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section B.2.of this permit.

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



Draft Title V Permit
FCA US LLC- Wrangler Paint Facility
Permit Number: P0118206
Facility ID:0448011731

Effective Date:To be entered upon final issuance

g) Miscellaneous Requirements

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



4. K303, Topcoat

Operations, Property and/or Equipment Description:

Two automotive topcoat booths w/ water wash filtration, using waterborne basecoat and solventborne clearcoat with regenerative thermal oxidizer (RTO) on heated flashoff, clearcoat zones

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

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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
	2 automotive topcoat booths and associated operations with control by water wash filtration for spray painting operations and use of a regenerative thermal oxidizer (RTO) for basecoat heated flash, clearcoat zones and topcoat ovens (process emissions)	
a.	OAC rule 3745-31-05(A)(3) (P0117219, as effective 7/14/2014)	Combined emissions from the paint booth stacks shall not exceed 5 pounds per hour and 21.9 tons per year of particulate matter equal to or less than 10 microns in diameter (PM ₁₀), combined emissions from the paint booth and curing oven stacks shall not exceed 247 pounds of volatile organic compounds (VOC) per hour, and see b)(2)a. through b)(2)g.
b.	OAC rule 3745-31-10 through 20 (P0117219, as effective 7/14/2014)	Combined emissions from the paint booth stacks shall not exceed 4.8 pounds per hour of particulate emissions (PE), and see b)(2)h. through b)(2)i.
c.	OAC rule 3745-31-21 through 27 (P0117219, as effective 7/14/2014)	See b)(2)j. through b)(2)l.
d.	OAC rule 3745-17-07(A)(1)	see b)(2)m.
e.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
f.	OAC rule 3745-21-09(C)(1)(c)	Combined emissions from the paint booth and curing oven stacks shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		15.1 pounds VOC per gallon of deposited solids. See b)(2)m.
g.	40 CFR Part 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)n.
h.	40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant topcoat operation subject to the emission limitations/control measures specified in this section.	See b)(2)m. and b)(2)o.
i.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)p.
j.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)q. [63.3091(a) and (b)]
k.	40 CFR Part 64 - Compliance Assurance Monitoring (CAM) (64.1 – 64.10) [In accordance with 40 CFR 64.2, this emissions unit is a major source of VOC emissions controlled with a thermal oxidizer.]	The permittee has included a CAM plan for those emissions units whose pre-controlled potential emissions exceed major source thresholds. The elements of the CAM plan have been incorporated in the monitoring requirements outlined in d)(3), d)(7), d)(8) and e)(3).
21.24 mmBtu/hr indirect fired, low NOx, natural gas clearcoat oven burners (combustion emissions)		
l.	OAC rule 3745-31-05(A)(3) (P0117219, as effective 7/14/2014)	Combined emissions from the stack(s) associated with the oven combustion gases shall not exceed: 0.083 pound carbon monoxide (CO) per mmBtu, 1.77 pounds of CO per hour, 7.76 tons of CO per year,



Effective Date:To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.81 pounds of nitrogen oxides (NO _x) per hour, 7.93 tons of NO _x per year, 0.04 pound of PE per hour, 0.18 ton of PE per year, 0.16 pound of PM ₁₀ per hour, 0.70 ton of PM ₁₀ per year, 0.0006 pound of sulfur dioxide (SO ₂) per mmBtu, 0.02 pound of SO ₂ per hour, 0.06 ton of SO ₂ per year, 0.12 pound of VOC per hour, 0.53 ton of VOC per year, and see b)(2)r. and b)(2)s.
m.	OAC rule 3745-31-05(D) (P0117219, as effective 7/14/2014)	See b)(2)t. and b)(2)u.
n.	OAC rule 3745-31-10 through 20 (P0117219, as effective 7/14/2014)	0.085 pound NO _x per mmBtu, 0.0019 pound PE per mmBtu, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)t. and b)(2)v.
o.	OAC rule 3745-31-21 through 27 (P0117219, as effective 7/14/2014)	0.085 pound NO _x per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)t. and b)(2)w.
p.	OAC rule 3745-17-07(A)(1)	see b)(2)m.
q.	OAC rule 3745-17-10(B)(1)	see b)(2)m.
r.	OAC rule 3745-18-06(A)	see b)(2)x.
14.0 mmBtu/hour natural gas fired regenerative thermal oxidizer shared by K301 and K303 (combined combustion emissions)		
s.	OAC rule 3745-31-05(A)(3) (P0117219, as effective 7/14/2014)	1.16 pounds of CO per hour, 5.11 tons of CO per year, 1.19 pounds of NO _x per hour, 5.24 tons of NO _x per year, 0.03 pound of PE per hour, 0.13 ton of PE per year, 0.11 pound of PM ₁₀ per hour, 0.50 ton of PM ₁₀ per year, 0.009 pound of SO ₂ per hour, 0.04 ton of SO ₂ per year, 0.084 pound of VOC per hour, 0.37 ton of VOC per year, 5% opacity as a 6 minute average, and see b)(2)s. and b)(2)y.
t.	OAC rule 3745-31-05(A)(3)(a)(ii) (P0117219, as effective 7/14/2014)	See b)(2)z.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack serving the topcoat booths shall not exceed 5% opacity as a 6-minute average.
- b. The permittee shall allow no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 27, 40 CFR Part 60 Subpart MM, and 40 CFR Part 63 Subparts A and IIII.
- d. The hourly PE and VOC emission limitations above were established for PTI purposes to reflect the controlled potential to emit for this emissions unit based on the worst case operating scenario (82 jobs/hour). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- e. The permittee shall operate and maintain a water wash system(s) to control particulate emissions from each spray booth operation. The water wash system(s) shall be installed, operated and maintained in accordance with the manufacturer's recommendations with any amendments deemed necessary by the permittee.
- f. The permittee shall operate and maintain a thermal oxidizer, with a 100% capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the sections of the coating line identified as the basecoat heated flash, clearcoat bells and topcoat ovens. The thermal oxidizers shall be operated and maintained in accordance with the manufacturer's recommendations with any amendments deemed necessary by the permittee.
- g. The average combustion temperature within any thermal oxidizer, for any 3-hour block of time when the oxidizer is in operation as a VOC control device for compliance purposes, shall not be below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- h. The combined emissions of PE from the coating operations shall not exceed 21 tons as a rolling, 12-month summation.

The hourly and annual PE emission limitations were established for PTI purposes to reflect the controlled potential to emit for this emissions unit. Therefore, provided the water wash system is operated and maintained properly, it is not necessary to develop monitoring, record keeping and/or reporting requirements
- i. The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 23.14 tons of PM₁₀ per rolling, 12-month period.

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

- j. The combined emissions of VOC from the paint booth stacks and curing oven stacks (the non-combustion sources) associated with this emissions unit shall not exceed 5.42 pounds of volatile organic compounds per gallon of applied coating solids as a volume-weighted daily average.
- k. The combined emissions from the operation of the non-combustion sources of this emissions unit shall not exceed 300.6 tons of VOC per rolling, 12-month period.
- l. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$300.6 \text{ tons VOC} \geq (1 - \mu) \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i, gallons of applied coating solids

VOC_i = the mass of VOC (emitted) per volume of coating material i, pounds per gallon of applied coating solids.

μ = the overall capture and control efficiency for the control equipment stated as a decimal fraction

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- m. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- n. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- o. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- p. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

- q. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

- r. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-31-10 through 27.
- s. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- t. The combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- u. The emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
- i. 35.49 tons of CO per rolling, 12-month period; and
 - ii. 0.26 ton of SO₂ per rolling, 12-month period.
- v. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- i. 21.13 tons of NO_x per rolling, 12-month period,
 - ii. 0.81 ton of PE per rolling, 12-month period, and
 - iii. 3.22 tons of PM₁₀ per rolling, 12-month period
- w. The emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
- i. 21.13 tons of NO_x per rolling, 12-month period, and
 - ii. 2.33 tons of VOC per rolling, 12-month period.
- x. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

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

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



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

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the thermal oxidizer combustion emissions of carbon monoxide (CO), nitrogen oxides (NO_x), particulate (PE), particulate matter less than or equal to 10 microns in diameter (PM₁₀), sulfur dioxide (SO₂), and volatile organic compound (VOC) from this air contaminant source since the uncontrolled potential to emit for CO, NO_x, PE, PM₁₀, PM_{2.5}, SO₂, and VOC is less than 10 tons per year.

c) Operational Restrictions

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

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

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

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

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

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

- (3) Each spray booth operation comprising this emissions unit shall be enclosed and all of the particulate emissions shall be exhausted through a water wash system.

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

- (4) The permittee shall operate the water wash system whenever the respective emission source is in operation.

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

- (5) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart MM, including the following sections:

60.393(b)	Requirement to demonstrate compliance monthly
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(A)(1)]

- (6) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:



If control is not required for compliance:	
63.3092(a)	Alternate electrodeposition primer system requirements
63.3093(a)	Exemption from operating limits
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3163(a),(b),(e),(f),(j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3174	Requirements for a capture system and control device which is not utilized to meet the Subpart IIII emission limitations
If control is required for compliance:	
63.3092(b)	Alternate electrodeposition primer system requirements
63.3093(b)	Requirement for meeting operating limitations specified in Table 1
63.3093(c)	Alternate requirements for operating limitations specified in Table 1
63.3094(b),(c)	Work practices requirements
63.3094(f)	Availability of work practice plan
63.3100(a) through (c)	General compliance requirements
63.3100(d)	Compliance in accordance with the provisions in 40 CFR 63.6(e)(1)(i).
63.3100(f)	Startup, shutdown and malfunction plan
63.3163(a) through (j)	Continuous compliance demonstration
63.3169	Exemption from listed requirements when a capture system and control device is not utilized to meet the Subpart IIII emission limitations
63.3173(a) through (c)	Alternate continuous compliance demonstration

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall maintain daily records that document any time periods when the water wash system(s) was not in service when the respective emissions source was in operation.

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

- (3) The permittee shall operate and maintain a continuous temperature monitor(s) and recorder(s) which measures and records the combustion temperature within the thermal oxidizer when the oxidizer is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor(s) and recorder(s) shall be installed, calibrated, operated and maintained in accordance

with the manufacturer's recommendations, with any amendments deemed necessary by the permittee and approved by the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 64.3]

- (4) Pursuant to OAC rule 3745-21-09(C)(4), the permittee shall maintain records for the top coat process that will enable the permittee to calculate the VOC emission rate in order to demonstrate compliance with the emissions limitation identified in b)(1) above for the topcoat process in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec.1988) and any subsequent revisions thereof. The permittee shall calculate the VOC emission rates for the topcoat operation in pounds of VOC per gallon of solids applied and in pounds of VOC per day, using the overall capture and control efficiency for the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- (5) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:
- the company identification for each coating utilized;
 - the volume of each coating applied during the month, Q_i , in gallons of applied coating solids;
 - the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon of applied coating solids;
 - the total VOC emissions from all coatings utilized, in tons; $(1-\mu)\sum_{i=1}^n(Q_i)(VOC_i) \div 2000$ pounds/ton, in tons per month;
 - the rolling, 12-month summation of VOC emissions, in tons per year.

The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months of operation after issuance of this permit. Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

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

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

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

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

- (7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[OAC rule 3745-77-07(C)(1) and 40 CFR 64.3]

- (8) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee



determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1), 40 CFR 64.7(d) and 40 CFR 64.9(b)]

- (9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.393(c)	Procedures for the monthly compliance demonstration
60.394(a) through (c)	Requirements for incinerator temperature monitoring equipment
60.395(b)	Quarterly/semiannual emissions exceedance recordkeeping requirements
60.395(c)	Thermal incinerator temperature recording requirements

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

- (10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:



If control is not required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
If control is required for compliance:	
63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(h)	Recordkeeping requirements related to startup, shutdown and malfunction
63.3130(i)	Recordkeeping requirements related to M204 PTE determination
63.3130(k)	Record retention for control device performance testing
63.3130(l)	Recordkeeping requirements related operating limits
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3130(o)	Recordkeeping requirements related to equipment operating instructions
63.3131(a) through (c)	Requirements for record retention and format
63.3168(a)	Requirements for operation, and maintenance of CPMS
63.3168(b)	Requirements for control device by-pass monitoring
63.3168(c)	Requirements for thermal oxidizer monitoring
63.3168(g)	Requirements for capture system monitoring
63.3169	Requirements for capture and control device which are not taken into account when demonstrating compliance with the applicable emission limitations

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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

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

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

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

- a. all 3-hour blocks of time during which the average combustion temperature within any thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
- c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9(a)]

- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation for the topcoat process.

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

- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e., $(1-\mu)\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton} > 300.6 \text{ tons}$ in any rolling, 12-month period.

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

- (6) The permittee shall submit semiannual reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) any corrective actions taken to eliminate the visible particulate emissions.

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

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

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



- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.

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

- (9) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, including the following sections:

60.395(b)	Quarterly/semiannual emissions exceedance reporting requirements
60.395(c)	Thermal incinerator temperature reporting requirements
60.395(d)	M25 30-day notification requirements

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

- (10) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

63.3120(a)	Semiannual compliance report content
63.3120(c)	Startup, shutdown and malfunction report content
63.3163(b)	Reporting requirements for reporting deviations of organic HAP emission rate
63.3163(c)(1)	Requirements for reporting deviations from operating limits
63.3163(d)	Requirements for control bypass deviations
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements
63.3163(h)	Administrator’s determination of violation

f) **Testing Requirements**

- (1) Compliance with the emission limitation(s) for the topcoat coating lines shall be determined in accordance with the following methods(s):

- a. Emission Limitation;
5% opacity, as a six-minute average

Applicable Compliance Method;

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.



b. Emission Limitation;

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

4.8 pounds of PE per hour

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

21 tons of PE per rolling 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the hourly maximum allowable emission limitation (4.8 pounds of PE



per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

5 pounds of PM₁₀ per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51 Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

21.9 tons of PM₁₀ per year

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the short-term allowable emission limitation (5 pounds per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

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

Applicable Compliance Method:

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

h. Emission Limitation:

100% capture efficiency and a minimum of 95 percent control efficiency for VOC

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR Part 60 Appendix A and Method 204 of 40 CFR Part 51, Appendix M, using



the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternate if such approval does not contravene any other applicable requirement.)

i. Emission Limitation

5.42 pounds of VOC per gallon of applied coating solids as a volume-weighted daily average.

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements of d)(4) of this permit.

j. Emission Limitation:

247 pounds of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation based on a worst case operating scenario of 82 jobs per hour and a company supplied emissions factor of 3.0 pounds VOC per job.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 and Method 24 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

k. Emission Limitation:

The combined emissions of VOC from all coating operations performed in this emissions unit shall not exceed 300.6 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements of d)(5)e. of this permit. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

l. Emission Limitation in accordance with OAC rule 3745-21-09(C)(1)(c):

2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids.



Applicable Compliance Method:

If required, compliance shall be demonstrated utilizing the methods and procedures of OAC rule 3745-21-09(C)(4). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

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

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- n. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- o. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pounds per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

- (2) Compliance with the emission limitation(s) for the topcoat oven stacks shall be determined in accordance with the following methods(s):

- a. Emission Limitation;

5% opacity, as a six-minute average



Applicable Compliance Method;

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

1.77 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternate, USEPA approved testing, may be used upon approval by the Ohio EPA.

d. Emission Limitation:

7.76 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.



e. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 50 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

1.81 pounds of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

7.93 tons of NO_x per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air



Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

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

i. Emission Limitation:

0.04 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour).

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

j. Emission Limitation:

0.18 ton of PE per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (21.24 mmBtu per hour) by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu

Applicable Compliance Method:

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



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

I. Emission Limitation:

0.16 pound of PM₁₀ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour).

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

m. Emission Limitation:

0.70 ton of PM₁₀ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

n. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



o. Emission Limitation:

0.02 pound of SO₂ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

p. Emission Limitation:

0.06 ton of SO₂ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

q. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

r. Emission Limitation:

0.12 pound of VOC per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

s. Emission Limitation:

0.53 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (21.24 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

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

t. Emission Limitation:

The emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- 35.49 tons of CO as a rolling, 12-month summation
- 21.13 tons of NO_x as a rolling, 12-month summation
- 0.81 ton of PE as a rolling, 12-month summation
- 3.22 tons of PM₁₀ as a rolling, 12-month summation
- 0.26 ton of SO₂ as a rolling, 12-month summation
- 2.33 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section B.2. of this permit.

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

(3) Compliance with the emission limitation(s) for the E-coat/thermal oxidizer shall be determined in accordance with the following methods(s):

a. Emission Limitation;

5% opacity, as a six-minute average



Applicable Compliance Method;

If required, compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

1.16 pounds of CO per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

5.11 tons of CO per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.16 pounds of CO per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

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

d. Emission Limitation:

1.19 pounds of NO_x per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

5.24 tons of NO_x per year



Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.19 pounds of NO_x per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

f. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

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

g. Emission Limitation:

0.13 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.03 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.11 pound of PM₁₀ per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

i. Emission Limitation:

0.50 ton of PM₁₀ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.11 pound of PM₁₀ per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.



j. Emission Limitation:

0.009 pound of SO₂ per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

k. Emission Limitation:

0.04 ton of SO₂ per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the allowable emission limitation (0.019 pound of SO₂ per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

l. Emission Limitation:

0.084 pound of VOC per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

m. Emission Limitation:

0.37 ton of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the allowable emission limitation (0.084 pound of VOC per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton.

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

- (4) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. the emission testing shall be conducted within 12 months after permit issuance and at least once every 5 years thereafter;
- b. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA;
- c. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Ohio EPA;
- d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternate, equivalent methods may be used upon approval by the Ohio EPA;
- e. the permittee shall collect, record and include in the test report the 3-hour average combustion temperature within the thermal incinerator during testing; and
- f. the permittee shall collect, record and include in the test report the monitoring parameters established to demonstrate that the emissions unit is in compliance with the 100 percent capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

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

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

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

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



g) Miscellaneous Requirements

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

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



5. P301, Sealer & Adhesive Application

Operations, Property and/or Equipment Description:

Sealer and adhesive application using low volatile organic compound (VOC) materials with control by appropriate work practices

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 operations(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. 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) (P0110183, effective 12/6/2012)	40 pounds of volatile organic compounds (VOC) per hour, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-21 through 27 (P0110183, effective 12/6/2012)	0.3 pound of VOC per gallon, minus water, on a monthly basis, 47.7 tons of VOC per rolling, 12-month period, and See b)(2)c. and b)(2)d.
c.	OAC rule 3745-21-09(U)(1)(d)	the emissions of VOC from any material which is applied to metallic surfaces shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents
d.	40 CFR Part 63 Subpart A (40 CFR 63.1-15)	see b)(2)e.
e.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	In accordance with 40 CFR 63.3091(c) the average organic hazardous air pollutant (HAP) emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kilogram per kilogram (pound per pound) of adhesive and sealer material used during each month. [63.3091(c)]



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 through 27 and 40 CFR Part 63 Subparts A and IIII.
- b. The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- c. The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.
- d. The maximum sealer and adhesive usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$47.7 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

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

VOC_i = volatile organic compound content of material i , pounds per gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- e. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3152(a) through (c)	Continuous compliance demonstration

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of compliance with the emissions limitation for material applied to metallic surfaces (3.5 pounds VOC per gallon, excluding water and exempt solvents) the



permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record on a monthly basis the following information:

- a. the name and identification number of each sealer and adhesive applied to metallic surfaces; and
- b. the VOC content, excluding water and exempt solvents, of each sealer and adhesive applied to metallic surfaces.

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

(2) For purposes of compliance with the emissions limitation for sealers and adhesives (0.3 pound of VOC per gallon, minus water, on a monthly basis), the permittee shall collect and record the following information each month for this emissions unit:

- a. When using complying coatings for all sealers and adhesives:
 - i. the name and identification number of each sealer and adhesive, as applied; and
 - ii. the VOC content, excluding water and exempt solvents, of each sealer and adhesive, as applied.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

- b. When calculating a monthly volume-weighted average VOC content for the sealers and adhesives, the permittee shall collect and record the following information each day for this emissions unit:
 - i. the name and identification number of each sealer and adhesive, as applied;
 - ii. the VOC content, excluding water and exempt solvents, and the number of gallons, excluding water and exempt solvents, of each sealer and adhesive, as applied; and
 - iii. the volume-weighted average VOC content of all sealer and adhesive, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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

(3) For purposes of compliance with the rolling, 12-month VOC emissions limitation for sealers and adhesives (47.7 tons), the permittee shall collect and record on a monthly basis the following information for all sealer and adhesive operations:

- a. the company identification of each sealer and adhesive utilized;
- b. the number of gallons of each sealer and adhesive utilized, Qi;



- c. the volatile organic compound content of each sealer and adhesive utilized, in pounds per gallon, VOC_i ;
- d. the total VOC emissions from all sealers and adhesives utilized, in tons, $\sum_{i=1}^n(Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$; and
- e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

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

e) Reporting Requirements

- (1) The permittee shall notify the Director of any monthly record showing the use of a sealer or adhesive in this emissions unit that was applied to metallic surfaces which exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the 0.3 pound of VOC per gallon, excluding water, emissions limitation. The notification shall include a copy of such record.

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

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all sealants and adhesives utilized in this emissions unit exceed 47.7 tons per rolling, 12-month period.

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



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

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

- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

- (6) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or Local Air Agency as are required pursuant to 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, per the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(b)	Reporting exceedance of HAP emission rate
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements

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

f) Testing Requirements

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

- a. Emission Limitations:

0.3 pound of VOC per gallon, minus water

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2) of this permit.

If required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



b. Emission Limitation:

40 pounds of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on the worst case operating scenario (82 jobs per hour) and a company supplied emissions factor (0.48 pound of VOC per job). If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 24 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3).

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(1).

If required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

0.010 kilogram per kilogram (pound per pound) of adhesive and sealer material used during each month.



Preliminary Proposed Title V Permit

FCA US LLC- Wrangler Paint Facility

Permit Number: P0118026

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3152. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

g) Miscellaneous Requirements

(1) None.



6. P302, Facility-wide cleaning materials with control by appropriate work practices

Operations, Property and/or Equipment Description:

Facility-wide cleaning materials, with control by appropriate work practices

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 operations(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. 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) (P0115749, effective 12/30/2013)	see b)(2)a.
b.	OAC rule 3745-31-21 through 27 (P0115749, effective 12/30/2013)	the emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 237.6 tons per rolling, 12-month period, and see b)(2)b.
c.	40 CFR Part 63 Subpart A (40 CFR 63.1-16)	see b)(2)c.
d.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	In accordance with 40 CFR 63.3094(b) and (c), the permittee shall develop and implement a work practice plan to minimize organic HAP emissions. [63.3082(b)]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 through 27 and 40 CFR Part 63 Subparts A and IIII.

b. The maximum facility-wide cleaning material usage shall be limited by the following formula, calculated as a rolling, 12-month summation:



237.6 tons VOC ≥ Σ_{i=1}^n (Q)(VOC_i) ÷ (2000 pounds/ton)

Where:

Q_i = usage of topcoat purge or cleaning solvent material i, gallons

VOC_i = volatile organic compound content of material i, pounds per gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- c. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

c) Operational Restrictions

- (1) The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.

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

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

Table with 2 columns: Code, Description. Rows include 63.3093(a) Operating restrictions, 63.3094(b),(c) Work practices, 63.3094(f) Availability of work practice plan, 63.3100(a),(c) General compliance requirements, 63.3163(a), (e), (f) & (j) Continuous compliance demonstration, 63.3173(a) through (c) Continuous compliance demonstration.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of compliance with the rolling, 12-month VOC emissions limitation for facility-wide cleaning materials (237.6 tons), the permittee shall collect and record on a monthly basis the following information for all facility-wide cleaning materials:
a. the company identification for each facility-wide cleaning material utilized;
b. the number of gallons of each facility-wide cleaning material utilized, Q_i;
c. the volatile organic compound content of each facility-wide cleaning material utilized, in pounds per gallon, VOC_i;



- d. the total VOC emissions from all facility-wide cleaning materials utilized, in tons;
 $\sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton});$
- e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

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

- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(d) through (f)	Recordkeeping requirements specified for cleaning materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(m)	Recordkeeping requirements for transfer efficiency
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all facility-wide cleaning materials utilized in this emissions unit exceed 237.6 tons per rolling, 12-month period.

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

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

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

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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



- (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or Local Air Agency as are required pursuant to 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, per the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements

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

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

237.6 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated though the record keeping requirements of d)(1).

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

g) Miscellaneous Requirements

- (1) None.



7. P304, Foam Injection (Deadener)

Operations, Property and/or Equipment Description:

Injected foam sound deadener with control by appropriate work practices

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 operations(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. 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) (P0110183, effective 12/6/2012)	emissions of volatile organic compounds (VOC) shall not exceed 6.8 pounds per hour, and see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-21 through 27 (P0110183, effective 12/6/2012)	emissions of VOC shall not exceed 0.14 pound per gallon of unreacted foam, 8.3 tons of VOC per rolling, 12-month period, and see b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(d)	see b)(2)d.
d.	40 CFR Part 63 Subpart A (40 CFR 63.1-16)	see b)(2)e.
e.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	Except as otherwise allowed, average organic hazardous air pollutant (HAP) emissions from all deadener materials shall not exceed 0.010 kilogram per kilogram (pound per pound) of deadener material used during each month, as determined according to the requirements in 40 CFR 63.3150 through 63.3152. [63.3091(d)]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 through 27 and 40 CFR Part 63, Subparts A and IIII.



- b. The hourly emission limitation above was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. The maximum foam sound deadening usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$8.3 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of unreacted foam sound deadener material i , gallons
 VOC_i = the mass of VOC (emitted) per volume of unreacted foam sound deadener material i , pounds per gallon.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

c) Operational Restrictions

- (1) The permittee shall employ techniques appropriate to minimize the emissions of VOC from this emissions unit.

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

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

63.3093(a)	Operating restrictions
63.3094(b),(c)	Work practices
63.3094(f)	Availability of work practice plan
63.3100(a),(c)	General compliance requirements
63.3152(a) through (c)	Continuous compliance demonstration

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of compliance with the rolling, 12-month VOC emissions limitation (8.3 tons), the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record on a monthly basis the following information for all foam sound deadener operations:



- a. the company identification for each unreacted foam sound deadener utilized;
- b. the number of gallons of each unreacted foam sound deadener utilized, Q_i ;
- c. the mass of VOC (emitted) per volume of unreacted foam sound deadener material, VOC_i ;
- d. the total VOC emissions from all foam sound deadener materials utilized, in tons;
 $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$ pounds/ton);
- e. the rolling, 12-month total quantity of VOC emissions, in tons.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

63.3130(a)	Record retention
63.3130(b)	Material supplier's or manufacturer's record retention
63.3130(c)	Recordkeeping requirements specified for coating materials
63.3130(g)	Recordkeeping requirements specified for deviations
63.3130(n)	Recordkeeping requirements related to work practice plans
63.3131(a) through (c)	Recordkeeping form and retention requirements

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the 0.14 pound of VOC per gallon, excluding water, emissions limitation. The notification shall include a copy of such record.

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all sound deadeners utilized in this emissions unit exceed 8.3 tons per rolling, 12-month period.

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

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

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



- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.

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

- (5) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or Local Air Agency as are required pursuant to 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, per the following sections:

63.3120(a)	Semiannual compliance report content
63.3163(e)	Requirements for work practices plan deviations
63.3163(f)	Statement of compliance requirements

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

f) Testing Requirements

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

a. Emission Limitations:

0.14 pound of VOC emitted per gallon of unreacted foam

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(1) of this permit. If required, compliance shall be demonstrated by using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A and an evaluation performed in accordance with OAC rule 3745-21-10(B). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

6.8 pounds of VOC per hour

Applicable Compliance Method:

Compliance shall be demonstrated based on a one-time calculation of the worst case operating scenario (82 jobs per hour) and a company supplied emissions factor (0.083 pound of VOC per job). If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 24 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



c. Emission Limitation:

8.3 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements of d)(1).

d. Emission Limitation for purposes of compliance with OAC rule 3745-21-09(U)(1)(d):

3.5 pound of VOC per gallon of unreacted foam, excluding water and exempt solvents

Applicable Compliance Method:

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

0.010 kilogram of HAP per kilogram (pound of HAP per pound) of sound deadener material used during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3152. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

g) Miscellaneous Requirements

(1) None.



8. P305, Topcoat/E-Coat/Anti-Chip Sanding

Operations, Property and/or Equipment Description:

E-coat, anti-chip and topcoat sanding stations, controlled by dry filtration

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 operations(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. 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) (P0110183, effective 12/6/2012)	Emissions from the stack(s) serving this emissions unit shall not exceed: 1.9 pounds of particulate emissions (PE) per hour, 0.62 pound of particulate matter less than or equal to 10 microns in diameter (PM ₁₀) per hour, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-10 through 20 (P0110183, effective 12/6/2012)	see b)(2)d. through b)(2)f.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)g.
d.	OAC rule 3745-17-11(B)(1)	see b)(2)g.

(2) Additional Terms and Conditions

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

b. The permittee shall permit no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.

c. Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average.

d. The permittee shall install and maintain a dust collection system with a minimum 98% capture and control efficiency for all particulate emissions from all sanding operations comprising this emissions unit.



- e. The combined emissions of PE from the sanding operations associated with the E-coat line (K301), the antichip line (K302) and topcoat line (K303) shall not exceed 2.25 tons per rolling, 12-month period.
- f. The combined emissions of PM₁₀ from the sanding operations associated with the E-coat line (K301), the antichip line (K302) and topcoat line (K303) shall not exceed 0.75 ton per rolling, 12-month period.
- g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) **Operational Restrictions**

- (1) All of the operations comprising this emissions unit shall be enclosed and all emissions shall be exhausted through a dry filtration system.

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

- (2) The permittee shall operate the dry filtration system whenever the respective emission source is in operation.

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

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

- (1) The permittee shall maintain daily records that document any periods when a dust collection system was not in service when the respective emissions source was in operation.

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

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when any dust collection system was not in service when the respective emissions source was in operation.

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

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

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

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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



f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from any stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

1.9 pounds of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

2.25 tons of PE per rolling, 12-month period



Applicable Compliance Method:

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

$(1-0.98 \text{ overall control})(0.288 \text{ pound of PE per hour per sanding station})(6 \text{ sanding stations})(8760 \text{ hours per year})(1 \text{ ton per } 2000 \text{ pounds}) = 0.15 \text{ ton of PE per year}$

If required, the permittee shall demonstrate compliance through emission testing for the exhaust gas particulate concentration and the combined exhaust gas flow rate performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

0.62 pound of PM₁₀ per hour

Applicable Compliance Method:

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

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

f. Emission Limitation:

The combined emissions of PM₁₀ from the sanding operations associated with the E-coat line (K301), the antichip line (K302) and topcoat line (K303) shall not exceed 0.75 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit, as follows:

$(1-0.98 \text{ overall control})(0.096 \text{ pound of PM}_{10} \text{ per hour per sanding station})(6 \text{ sanding stations})(8760 \text{ hours per year})(1 \text{ ton per } 2000 \text{ pounds}) = 0.05 \text{ ton of PM}_{10} \text{ per year}$

If required, the permittee shall establish a site specific emission factor through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



Preliminary Proposed Title V Permit

FCA US LLC- Wrangler Paint Facility

Permit Number: P0118026

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

g. Emission Limitation:

98% control of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through emissions testing at the inlet and outlet of the control device performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

g) Miscellaneous Requirements

(1) None.



9. Emissions Unit Group - 14 mmBtu/hr air makeup units: B305, B306, B307, B308, B309, B310,

EU ID	Operations, Property and/or Equipment Description
B305	14.00 mmBtu/hr natural-gas fired air make up unit w/low NOx burner
B306	14.00 mmBtu/hr natural-gas fired air make up unit w/low NOx burner
B307	14.00 mmBtu/hr natural-gas fired air make up unit w/low NOx burner
B308	14.00 mmBtu/hr natural-gas fired air make up unit w/low NOx burner
B309	14.00 mmBtu/hr natural-gas fired air make up unit w/low NOx burner
B310	14.00 mmBtu/hr natural-gas fired air make up unit w/low NOx burner

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 operations(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. 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) (P0116525 issued 4/2/2014)	Emissions from the stacks serving this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu, 1.2 pounds CO per hour, 5.3 tons of CO per year, 1.2 pounds of nitrogen oxides (NO _x) per hour, 5.3 tons of NO _x per year, 0.03 pound of particulate emissions (PE) per hour, 0.13 ton of PE per year, 0.11 pound of particulate emissions less than 10 microns in diameter (PM ₁₀) per hour, 0.5 ton of PM ₁₀ per year, 0.0006 pound sulfur dioxide (SO ₂) per mmBtu, 0.01 pound of SO ₂ per hour, 0.05 ton of SO ₂ year, 0.08 pound of volatile organic compounds (VOC) per hour, 0.35 ton of VOC per year, and



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FCA US LLC- Wrangler Paint Facility

Permit Number: P0118026

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see b)(2)a. through b)(2)c.
b.	OAC rule 3745-17-07(A)(1)	See b)(2)d.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)d.
d.	OAC rule 3745-18-06(A)	See b)(2)e.
e.	OAC rule 3745-31-05(D)	See b)(2)f. and b)(2)g.
f.	OAC rule 3745-31-10 through 20	Emissions from the stacks serving this emissions unit shall not exceed: 0.085 pound NO _x per mmBtu, 0.0019 pound of PE per mmBtu, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)f. and b)(2)h.
g.	OAC rule 3745-31-21 through 27	Emissions from the stacks serving this emissions unit shall not exceed: 0.085 pound NO _x per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)f. and b)(2)i.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 through 27.
- c. The emission limitations above were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, provided natural gas is the only fuel utilized in this emissions unit, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- e. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment when this emissions unit employs only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).



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

- f. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- g. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 35.49 tons of CO per rolling, 12-month period, and
 - ii. 0.26 ton of SO₂ per rolling, 12-month period.
- h. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period,
 - ii. 0.81 ton of PE per rolling, 12-month period, and
 - iii. 3.22 tons of PM₁₀ per rolling, 12-month period.
- i. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period, and
 - ii. 2.33 tons of VOC per rolling, 12-month period.

c) Operational Restrictions

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

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

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

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



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

[Authority for term: 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 a record of the type and quantity of fuel burned in this emissions unit.

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

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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

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

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

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

f) **Testing Requirements**

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation:**

visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

1.2 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

5.3 tons of CO per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour) and 8760 hours per year, and then dividing by 2000 pounds per ton.

e. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation



of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 50 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitation:

1.2 pounds of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

5.3 tons of NO_x per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour) and 8760 hours per year, and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures



specified in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

i. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour).

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

j. Emission Limitation:

0.13 ton of PE per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour) and 8760 hours per year, and then dividing by 2000 pounds per ton.

k. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu

Applicable Compliance Method:

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

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



I. Emission Limitation:

0.11 pound of PM₁₀ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour).

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

m. Emission Limitation:

0.5 ton of PM₁₀ per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour) and 8760 hours per year, and then dividing by 2000 pounds per ton.

n. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

o. Emission Limitation:

0.01 pound of SO₂ per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

p. Emission Limitation:

0.05 ton of SO₂ per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour) and 8760 hours per year, and then dividing by 2000 pounds per ton.

q. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

r. Emission Limitation:

0.08 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour).



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

s. Emission Limitation:

0.35 ton of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (14 mmBtu per hour) and 8760 hours per year, and then dividing by 2000 pounds per ton.

t. Emission Limitation:

The emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- 35.49 tons of CO as a rolling, 12-month period
- 21.13 tons of NO_x as a rolling, 12-month period
- 3.22 tons of PM₁₀ as a rolling, 12-month period
- 0.81 ton of PE as a rolling, 12-month period
- 0.26 tons of SO₂ as a rolling, 12-month period
- 2.33 tons of VOC as a rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in B.2.c) and the emissions factors demonstrated in B.2.e) of the permit.

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

g) Miscellaneous Requirements

- (1) None.



10. Emissions Unit Group - NG boilers: B301, B304.

EU ID	Operations, Property and/or Equipment Description
B301	20.40 mmBtu per hour natural gas boiler with low NOx burners and Flue gas recirculation
B304	20.40 mmBtu per hour natural gas boiler with low NOx burners and Flue gas recirculation

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 operations(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. 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) (P0119070 issued 6/18/2015)	Emissions from the stack serving this emissions unit shall not exceed: 0.083 pound carbon monoxide (CO) per mmBtu, 1.7 pounds of CO per hour, 7.5 tons of CO per year, 0.72 pound of nitrogen oxides (NO _x) per hour, 3.16 tons of NO _x per year, 0.04 pound of particulate emissions (PE) per hour, 0.18 ton of PE per year, 0.15 pound of particulate emissions of less than or equal to 10 microns in diameter(PM ₁₀) per hour, 0.66 ton of PM ₁₀ per year, 0.0006 pound of sulfur dioxide (SO ₂) per mmBtu, 0.01 pound of SO ₂ per hour, 0.05 ton of SO ₂ year, 0.11 pound of volatile organic compounds (VOC) per hour, 0.5 ton of VOC per year, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D) (P0119070 issued 6/18/2015)	see b)(2)d. and b)(2)e.
c.	OAC rule 3745-31-10 through 20	Emissions from the stack serving this



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(P0119070 issued 6/18/2015)	emissions unit shall not exceed: 0.035 pound of NO _x per mmBtu, 0.0019 pound of PE per mmBtu, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)d. and b)(2)f.
d.	OAC rule 3745-31-21 through 27 (P0119070 issued 6/18/2015)	Emissions from the stack serving this emissions unit shall not exceed: 0.035 pound of NO _x per mmBtu, 0.0054 pound of VOC per mmBtu, and see b)(2)d. and b)(2)g.
e.	OAC rule 3745-17-07(A)(1)	see b)(2)h.
f.	OAC rule 3745-17-10(B)(1)	see b)(2)h.
g.	OAC rule 3745-18-06(A)	Exempt. see b)(2)i.
d.	40 CFR Part 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)j. and b)(2)k.
i.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c through 60.48c) In accordance with 40 CFR 60.40c, this emissions unit is a steam generating unit for which construction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 mmBtu per hour or less, but greater than or equal to 10 mmBtu per hour and is subject to the emission limitations/control measures specified in this section.	See b)(2)k. and b)(2)l.
o.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)m.
p.	40 CFR Part 63 Subpart DDDDD (40 CFR 63.7480 through 63.7575) In accordance with 40 CFR 63.7485, this emissions unit is an existing industrial boiler in the designed to burn gas 1 subcategory with a heat input capacity greater than 10 mmBtu per hour that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section.	See b)(2)n. and b)(2)o. [40 CFR 63.7500]



- (2) Additional Terms and Conditions
- a. Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average.
 - b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rules 3745-31-10 through 27, and 40 CFR Part 63 Subparts A and DDDDD.
 - c. The hourly and annual emission limitations above were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
 - d. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
 - e. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 35.49 tons of CO per rolling, 12-month period, and
 - ii. 0.26 ton of SO₂ per rolling, 12-month period.
 - f. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period,
 - ii. 0.81 ton of PE per rolling, 12-month period, and
 - iii. 3.22 tons of PM₁₀ per rolling, 12-month period.
 - g. The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:
 - i. 21.13 tons of NO_x per rolling, 12-month period, and
 - ii. 2.33 tons of VOC per rolling, 12-month period.
 - h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
 - i. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment when this emissions unit employs only natural gas as fuel.



- j. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- k. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- l. The permittee shall comply with the applicable provisions of 40 CFR Part 60 Subpart Dc.
- m. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.
- n. Following the initial compliance date, tune-ups must be conducted for each boiler within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing boiler no later than 1/31/16; unless the boiler is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.
- o. For each existing boiler a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/16. The one-time energy assessment for existing units must meet the energy assessment requirements as outlined in Table 3 of 40 CFR Part 63 Subpart DDDDD. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement.

c) Operational Restrictions

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

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

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, National Emission Standards For Hazardous Air Pollutants For Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, including the following sections:

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

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



d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, including the following sections:

60.48c(g)(2)	Requirement to record and maintain records of the amount of each fuel combusted during each calendar month.
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[Authority for term: 40 CFR Part 60 and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, National Emission Standards For Hazardous Air Pollutants For Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, including the following sections:

63.7515(d)	Each annual tune-up specified 63.7540(a)(10) must be no more than 13 months after the previous tune-up.
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7555(a)	General recordkeeping requirements
63.7555(i),(j)	Recordkeeping requirements for startup and shutdown
63.7560(a)-(c)	Recordkeeping retention and format

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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

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

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

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: Industrial, Commercial, and Institutional Boilers and Process Heaters, including the following sections:



60.48c(d)	Requirement to submit reports.
60.48c(e)	Requirements for report contents.
60.48c(g)	Requirements for fuel usage records
60.48c(i)	Record Retention
60.48c(j)	Requirements for semi-annual reporting

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

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, National Emission Standards For Hazardous Air Pollutants For Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, including the following sections:

63.7532(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550
63.7550(b),(c)(1)	Submit an annual compliance report with the information in 40 CFR 63.7550(c)(5)(i) through (iv) and (xiv)

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation (natural gas):

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per



standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

1.7 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (20.4 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

7.5 tons of CO per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable CO emission limitation (1.7 pounds per hour) by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

0.035 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 32 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



f. Emission Limitation:

0.72 pound of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.035 pound of NO_x per mmBtu) by the maximum heat input of the burners (20.4 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

3.16 tons of NO_x per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable NO_x emission limitation (0.72 pound per hour) by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

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

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

i. Emission Limitation:

0.04 pound of PE per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (20.4 mmBtu per hour).

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

j. Emission Limitation:

0.18 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable PE emission limitation (0.04 pound per hour) by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

0.0075 pound of PM₁₀ per mmBtu

Applicable Compliance Method:

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

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

l. Emission Limitation:

0.15 pound of PM₁₀ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM₁₀ per mmBtu) by the maximum heat input of the burners (20.4 mmBtu per hour).



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

m. Emission Limitation:

0.66 ton of PM₁₀ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable PM10 emission limitation (0.15 pound per hour) by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

n. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

o. Emission Limitation:

0.01 pound of SO₂ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (20.4 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



p. Emission Limitation:

0.05 ton of SO₂ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable SO₂ emission limitation (0.01 pound per hour) by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

q. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

r. Emission Limitation:

0.11 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (20.4 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

s. Emission Limitation:

0.5 ton of VOC per year



Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable VOC emission limitation (0.11 pound per hour) by the maximum annual hours of operation (8760 hours per year), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

t. Emission Limitation:

The combined emissions from the combustion of natural gas in B301, B303 through B310 and K301 through K303 shall not exceed the following:

- 35.49 tons of CO as a rolling, 12-month summation
- 21.13 tons of NO_x as a rolling, 12-month summation
- 0.81 ton of PE as a rolling, 12-month summation
- 3.22 tons of PM₁₀ as a rolling, 12-month summation
- 0.26 ton of SO₂ as a rolling, 12-month summation
- 2.33 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in B.2.c) and the emissions factors demonstrated in B.2.e) of the permit.

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

- (2) Each tune-up conducted to demonstrate compliance with the requirements of Part 63 Subpart DDDDD shall comply with the applicable work practice standards for a tune-up as outlined in Table 3 of 40 CFR Part 63 Subpart DDDDD.

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

g) Miscellaneous Requirements

- (1) None.



11. Emissions Unit Group - off-line repair spray booths: K404, K405,

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

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
automotive off-line repair booth with dry filtration		
a.	OAC rule 3745-31-05(A)(3) (P0116662, effective 6/6/2014)	Emissions from the stack associated with the repair booth shall not exceed: 2.4 tons of particulate emissions (PE) per year, 0.62 ton of particulate matter equal to or less than 10 microns in diameter (PM ₁₀) per year, 14.5 tons of volatile organic compounds (VOC) per year, 5% opacity as a 6-minute average, and see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 through 20 (P0116662, effective 6/6/2014)	Emissions from the stack associated with the repair booth shall not exceed: 0.551 pound PE per hour, 0.0015 grain of PM ₁₀ per dry standard cubic foot (gr/dscf), and see b)(2)c. and b)(2)d.
c.	OAC rules 3745-31-21 through 27 (P0116662, effective 6/6/2014)	See b)(2)e. through b)(2)g.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)h.
e.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
f.	OAC rule 3745-21-09(C)(1)(d)	Emissions from the stack associated with the clean shop repair station shall not exceed 4.8 pounds of VOC per gallon as



Preliminary Proposed Title V Permit

FCA US LLC- Wrangler Paint Facility

Permit Number: P0118026

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		a daily volume weighted average of coating, excluding water and exempt solvents.
g.	40 CFR Part 63 Subpart A (63.1 through 63.16)	See b)(2)i.
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)j. [63.3091(a) and (b)]
sanding station(s)		
i.	OAC rule 3745-31-05(A)(3) (P0116662, effective 6/6/2014)	Emissions from the stack(s) associated with the sanding station(s) shall not exceed: 2.4 tons of PE per year, 1.85 tons of PM ₁₀ per year, 5% opacity as a 6-minute average, and see b)(2)k. and b)(2)l.
j.	OAC rule 3745-31-10 through 20 (P0116662, effective 6/6/2014)	Emissions from the stack(s) associated with the sanding station(s) shall not exceed: 0.0015 gr/dscf of PM ₁₀ ; and see b)(2)b. through b)(2)d.
k.	OAC rule 3745-17-07(A)(1)	See b)(2)h.
l.	OAC rule 3745-17-11(B)(1)	Emissions from the stack associated with the sanding station(s) shall not exceed 0.551 pound PE per hour.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 27 and 40 CFR Part 63 Subparts A and IIII.
- b. The permittee shall allow no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. All of the operations comprising this emissions unit that generate particulate emissions shall be enclosed and all particulate emissions shall be exhausted through a particulate control system providing a minimum 98% overall control efficiency.



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

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

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

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

Where:

Q_i = usage of coating material i, gallons

VOC_i = the mass of VOC (emitted) per volume of coating material i, pounds per gallon.

- h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- i. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- j. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3163;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure



electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3173.

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

c) Operational Restrictions

- (1) All of the operations comprising this emissions unit shall be fully enclosed and all emissions shall be exhausted through a dry filtration system.

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

- (2) The permittee shall operate the dry filtration system whenever the respective emission source is in operation.

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

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

a.	63.3100(a)	General compliance requirements
b.	63.3100(c)	Work practice compliance requirements
c.	63.3100(d)	Operation and maintenance compliance requirements
d.	63.3163	Specific operating limits to demonstrate continuous compliance
e.	63.3173	Continuous compliance demonstration requirements

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when this emissions unit was in operation.

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



- (2) The permittee may elect to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit. This election shall be made by advance written notification to the Director and shall remain in effect on a calendar month basis.

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

- (3) When compliance is being demonstrated through the use of compliance coatings (i.e., each coating utilized shall comply with the applicable limitation of 4.8 pounds of VOC per gallon as applied), the permittee shall collect and record the following information each month for the coating line:
- a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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

- (4) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

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

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



or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., “b” times “c” for worst case coating;

- e. the calendar year summation of VOC emissions, in tons per year.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

- (6) For purposes of compliance with the annual maximum coating utilization in emissions units K404 and K405, the permittee shall collect and record on a monthly basis the following information:

- a. the company identification for each coating utilized;
- b. the volume of each coating applied during the month, Q_i , in gallons;
- c. the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon;
- d. the total VOC emissions from all coatings utilized, in tons; $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$ pounds/ton), in tons per month;
- e. the rolling, 12-month summation of VOC emissions, in tons per year.

Alternate, equivalent record keeping methods may be used upon written approval by the Ohio EPA.

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

- (7) The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months of operation after issuance of this permit.

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

- (8) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, including the following sections:

a.	63.3130(a) through (g), (m) and (n)	General recordkeeping
b.	63.3131(a) through (c)	Record format and retention requirements
c.	63.3173(a) through (c)	Continuous compliance requirements

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



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when the dry filtration system was not in service when the respective emissions source was in operation.

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

- (2) The permittee shall submit advance written notification of the election to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit.

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

- (3) When compliance is being demonstrated through the use of compliance coatings, the permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

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

- (4) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.

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

- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the emissions unit exceeds the annual VOC emissions limitation for all coatings employed (14.5 tons per year).

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

- (6) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization in emissions units K404 and K405 exceeds the applicable limitation, i.e., $(\sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 15.0$ tons, in any rolling, 12-month period.

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

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

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

- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



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

- (9) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or Local Air Agency as are required pursuant to 40 CFR Part 63, Subpart IIII - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, per the following sections:

63.3120(a)	Compliance reporting requirements
63.3163(b),(c)(1)	Deviation reporting requirement
63.3173(b)	Deviation reporting requirement

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

f) Testing Requirements

- (1) Compliance with the emission limitation(s) for the repair booth filter exhaust stack shall be determined in accordance with the following method(s):

a. Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average from any stack serving this emissions unit.

Applicable Compliance Method:

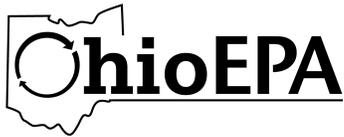
If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.



c. Emission Limitation:

0.551 pound of PE per hour

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (pounds per hour)

M = maximum coating solids usage rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

2.4 tons of PE per year

Applicable Compliance Method:

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

e. Emission Limitation:

98% control of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A



using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

f. Emission Limitation:

0.0015 grain of PM₁₀ per dry standard cubic foot

Applicable Compliance Method:

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

g. Emission Limitation:

0.62 ton of PM₁₀ per year

Applicable Compliance Method:

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

$(1-98\% \text{ overall control efficiency})[(0.096 \text{ pound PM}_{10} \text{ per station-hour from sanding})(2 \text{ stations})(8760 \text{ hours per year}) + (7700 \text{ gallons per year})(15.0 \text{ pounds per gallon})(80\% \text{ solids content})(1-35\% \text{ transfer efficiency})] \div 2000 \text{ pounds per ton} = 0.62 \text{ ton of PM}_{10} \text{ per year}$

If required, the permittee shall establish a site specific emission factor, in grains per standard cubic foot, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and evaluate the site specific volumetric flow in accordance with Methods 1 through 4 of 40 CFR Part 60 Appendix A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

h. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA



provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

i. Emission Limitation:

14.5 tons of VOC per year

Applicable Compliance Method:

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

j. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3163. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

k. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

combined HAP emissions shall not exceed 0.132 kilogram per liter (1.10 pounds per gal) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3173. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

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

a. Emission Limitation:

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



Preliminary Proposed Title V Permit

FCA US LLC- Wrangler Paint Facility

Permit Number: P0118026

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

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

If required, the permittee shall establish compliance through emission testing of K303 for the exhaust gas particulate concentration and the combined exhaust gas flow rate, performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA.

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.