



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

3/25/2016

Certified Mail

Mr. Gerald King
General Motors Company - Lordstown Complex
2300 Hallock-Young Rd.
Lordstown Township, OH 44481

Facility ID: 0278000199
Permit Number: P0118611
County: Trumbull

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

Dear Permit Holder:

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

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

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

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

General Motors Company - Lordstown Complex

General Motors Lordstown Complex, P.O. Box 1406 - 2300 Hallock-Young Road, Warren, OH 44482

ID#: P0118611

Date of Action: 3/25/2016

PermitDesc: Title V renewal permit for Automobile Stamping, Assembly and Finishing facility..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Christine Barnie, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



Statement of Basis
 General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0278000199
Facility Name:	General Motors Company - Lordstown Complex
Facility Description:	Automobile Stamping, Assembly and Finishing
Facility Address:	General Motors Lordstown Complex, Warren, OH 44482
Permit #:	P0118611, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input checked="" type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	N/A
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	K025 – Thermal oxidizer and VOC concentrator - – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.a)		40CFR Part 63, Subpart IIII	Facility is subject to the National emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light-Duty Trucks
B.2.b)		40CFR Part 63, Subpart EEEE	Facility is subject to the National emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution. The only emissions unit(EU) covered is T005, an insignificant EU.
B.3.	31-05(D)		Synthetic minor operational restriction from PTI 02-17027 for natural gas combustion (emissions unit P025) and to restrict the maximum annual production rate to 502,755 jobs (completed autos), based upon a rolling, 12-month summation. Original rule citation was OAC rule 3745-31-05(C) in 2004 which has been amended to OAC rule 3745-31-05(D).



B.4.	31-05(D)		Record keeping for operational restriction
B.5.	31-05(D)		Reporting for operational restriction

C. Emissions Unit Terms and Conditions

Key:													
EU = emissions unit ID							R = record keeping requirements						
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)							Rp = reporting requirements						
OR = operational restriction							ET = emission testing requirements (not including compliance method terms)						
M = monitoring requirements							St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement						
ENF = did noncompliance issues drive the monitoring requirements?							Misc = miscellaneous requirements						
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
G002	Stage I Vapor Control	21-09(R)		N	Y	Y	N	Y	Y	N	N	N	Stage I vapor control - 90% control efficiency for volatile organic compounds (VOCs), submerged fill
K017	1.42 lbVOC/gal solids applied		40CFR Part 60, Subpart MM	N	Y	Y	N	Y	Y	Y	N	N	OR - temp. restriction for thermal incinerator 3745-21-09(B)(3)(I)(iii), capture and destruction eff. 3745-21-09(B)(6), and restricted operating hour contained in permit to install for synthetic minor.
K017	0.6 lb VOC/gal ctg	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR - temp. restriction for thermal incinerator 3745-21-09(B)(3)(I)(iii), capture and destruction eff. 3745-21-09(B)(6), and restricted operating hour contained in permit to install for synthetic minor.
K017	301 lb VOC/day	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR - temp. restriction for thermal incinerator 3745-21-09(B)(3)(I)(iii), capture and destruction eff. 3745-21-09(B)(6), and restricted operating hour contained in permit to install for synthetic minor.
K017, K025, K026, K027, and K028	Option: 0.3 or 0.5lb HAP/gal solids applied		40CFR Part 63, Subpart IIII	N	N	Y	N	Y	Y	Y	N	N	



K025	6.07 lbs VOC/gal solids applied	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.
K025	7174 lbs VOC/day	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.
K025	326 lbs VOC/hr	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.
K025	941 tpy VOC	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.
K025	PE:9.5 lbs/hr	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – overspray filtration system required
K025	VE = 20%	17-07(A)		N	Y	Y	N	Y	Y	Y	N	N	OR – overspray filtration system required
K025	NOx: 3.1 lbs/hr	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K025	CO: 1.9 lbs/hr	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K025	Incinerator DE=95%	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.
K025	Concentrator RE=90%	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.
K025	Thermal oxidizer and VOC Concentrator		40 CFR Part 64 Compliance Assurance	N	Y	Y	N	Y	Y	N	N	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. minor PTI.



			Monitoring (CAM)										
K026	0.13 lbs VOC/gal solids applied	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K026	73.7 lbs VOC/hr	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K026	9.7 tpy VOC	31-05(D)		N	N	Y	N	Y	Y	Y	N	N	
K027	160 lbs VOC/day	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K027	8.35 lbs VOC/hr	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K027	24 tpy VOC	31-05(C)		N	N	Y	N	Y	Y	Y	N	N	
K027	PE:0.551 lbs/hr	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – overspray filtration system required.
K027	VE = 20%	17-07(A)		N	Y	Y	N	Y	Y	Y	N	N	OR – overspray filtration system required.
K027	0.5 lb HAP/gal solids app.		40 CFR, Part 63, Subpart IIII	N	N	Y	N	Y	Y	Y	N	N	
K028	936 lbs VOC/day	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	
K028	49.5 lbs	31-05(A)(3)		N	N	Y	N	Y	Y	Y	N	N	



	VOC/hr												
K028	143 tpy VOC	31-05(C)		N	N	Y	N	Y	Y	Y	N	N	
K028	0.01 lb HAP/lbadh. And sealer		40 CFR, Part 63, Subpart IIII	N	N	Y	N	Y	Y	Y	N	N	
K033	266.7 tpy VOC	31-05(C)		N	Y	Y	N	Y	Y	Y	N	N	OR – use of photochemically reactive material prohibited
K033	0.5 lb HAP/gal solids app.		40 CFR, Part 63, Subpart IIII	N	N	Y	N	Y	Y	Y	N	N	
P025	PE: 7.3 TPY	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – requires use of natural gas only
P025	OC: 5.3 TPY	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – requires use of natural gas only
P025	SO ₂ : 0.6 TPY	31-05(A)(3)		N	Y	Y	N	Y	Y	Y	N	N	OR – requires use of natural gas only
P025	NO _x : 133.7 TPY	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N	OR – requires use of natural gas only
P025	CO: 80.2 TPY	31-05(D)		N	Y	Y	N	Y	Y	Y	N	N	OR – requires use of natural gas only



Statement of Basis

General Motors Company - Lordstown Complex

Permit Number: P0118611

Facility ID: 0278000199



DRAFT

**Division of Air Pollution Control
Title V Permit
for
General Motors Company - Lordstown Complex**

Facility ID:	0278000199
Permit Number:	P0118611
Permit Type:	Renewal
Issued:	3/25/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
General Motors Company - Lordstown Complex

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Draft Title V Permit
General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0278000199
Facility Description: Automobile Stamping, Assembly and Finishing
Application Number(s): A0052592
Permit Number: P0118611
Permit Description: Title V renewal permit for Automobile Stamping, Assembly and Finishing facility.
Permit Type: Renewal
Issue Date: 3/25/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0110272

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

General Motors Company - Lordstown Complex
General Motors Lordstown Complex
P.O. Box 1406 - 2300 Hallock-Young Road
Warren, OH 44482

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

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

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



13. Compliance Requirements

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



and conditions with which there has been continuous compliance throughout the year are not separately identified.

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

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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



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

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



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

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

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

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

28. Permit Transfers

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

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

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

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

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

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



Draft Title V Permit
General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199
Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

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



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B. Facility-Wide Terms and Conditions



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

a) None.

2. The permittee shall comply with the requirements contained within the most recent version of the following regulations that are applicable to the facility:

a) 40 CFR Part 63, Subpart IIII – National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks. 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 Ohio EPA Northeast District Office.

(1) The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K017, K025, K026, K027, K028, and K033.

b) 40 CFR Part 63, Subpart EEEE – National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). 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 Ohio EPA Northeast District Office.

(1) The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart EEEE: T005 (insignificant emissions unit listed in B.3)

(2) Emissions unit T005 (14,000 gallons capacity containing methanol concentrate with a vapor pressure less than 27.6 kilopascals) is not subject to the provisions of Sec. 63.2346, Emission Limitations, Operating Limits, and Work Practice Standards. It is only subject to the requirements specified in Sec. 63.2386(d), Reporting Requirements.

3. Applicable Emissions Limitations and/or Control Requirements

a) The specific operation(s), property, and/or equipment that constitute the facility along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Facility-wide emissions 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
(1)	OAC rule 3745-31-05(D) (Federally Enforceable Synthetic Minor Restriction)	See B.4.a)

b) Additional Terms and Conditions

(1) None.



4. Operational Restrictions

- a) The maximum annual production rate off of the final assembly line shall not exceed 502,755 jobs (completed autos), based upon a rolling, 12-month summation.

[Authority for term: OAC rule 3745-31-05(D) (PTI No. 02-17027) and OAC rule 3745-77-07(A)(1)]

5. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall maintain monthly records of the following information for this emissions unit:

- (1) the monthly jobs produced off of the final assembly; and
- (2) the rolling, 12-month summation jobs produced off of the final assembly.

[Authority for term: OAC rule 3745-31-05(D) (PTI No. 02-17027) and OAC rule 3745-77-07(C)(1)]

6. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling, 12-month limitation jobs produced off of the final assembly was exceeded.

[Authority for term: OAC rule 3745-31-05(D) (PTI No. 02-17027) and OAC rule 3745-77-07(C)(1)]

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

8. All reports submitted through Ohio EPA eBusiness Center: Air Services shall be deemed to have been submitted by a responsible official.



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C. Emissions Unit Terms and Conditions



1. G002, Gasoline Operation

Operations, Property and/or Equipment Description:

Gasoline Operation (Tank #8 & 9 Gasoline/Gasfill)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(R)	Stage I vapor control - 90% control efficiency for volatile organic compounds (VOCs), submerged fill

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall comply with the following operational restrictions for the Stage I vapor control system:

a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.

b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

c. There shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline.

d. The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

e. All fill caps shall be "in place" and clamped during normal storage conditions.



- f. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

[Authority for term: OAC rule 3745-21-09(R)(2) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) OAC rule 3745-21-09(R) does not establish or require a regular leak-checking program. However, for any leak checks performed, the permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:
 - a. date of inspection;
 - b. findings (may indicate no leaks discovered or location, nature, and severity of each leak);
 - c. leak determination method;
 - d. corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days); and
 - e. inspector's name and signature.

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

e) Reporting Requirements

- (1) Any leak from the vapor balance system or vapor control system that is not repaired within 15 days after identification shall be reported to the Director within 30 days.

[Authority for term: OAC rule 3745-21-09(R)(3) 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. None.

g) Miscellaneous Requirements

- (1) None.



2. K017, Cathodic EDP Prime Coating System

Operations, Property and/or Equipment Description:

Cathodic EDP Primer Coating System (“Elpo Dip System”)

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) (PTI 02-7344)	See b)(2)b, b)(2)c, c)(1), c)(2), and c)(3). The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM.
c.	OAC rule 3745-21-09(C)	See b)(2)d.
d.	40 CFR Part 63, Subpart IIII (40 CFR 63.3090)	Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b). See b)(2)e, c)(6), d(7) and e(10).
e.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.



(2) Additional Terms and Conditions

- a. The permittee shall not cause to be discharged into the atmosphere from this emissions unit, volatile organic compounds (VOC) emissions in excess of 0.17 kilogram of VOC per liter of applied solids, or 1.42 pounds of VOC per gallon of applied solids, on a monthly volume-weighted average basis.
- b. The VOC contents of the coatings employed in this emissions unit shall not exceed 0.6 pound of VOC per gallon of coating, excluding water and exempt solvents, on a monthly volume-weighted average basis.
- c. The maximum daily emission rate for this emissions unit shall not exceed 301 pounds of VOC. In addition, the total VOC emissions from this emissions unit, including cleanup materials, shall not exceed 45.2 tons per year.
- d. The requirements of OAC rule 3745-21-09(C) are less stringent than the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-31-05.
- e. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3100	General Compliance Requirements
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c) Operational Restrictions

- (1) The permittee shall limit the production operation of the Elpo Dip System to 6000 hours per year.
 [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- (2) The permittee shall employ a VOC capture system that captures emissions from the Elpo Dip System. The total capture efficiency for this system shall be at least 70%, by weight, for all coatings and solvents employed.
 [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- (3) The permittee shall operate a VOC oxidizer system at all times the Elpo Dip System is in operation. The VOC oxidizers shall either have a destruction efficiency of no less than 90% of non-methane volatile organic compounds or shall meet an outlet concentration of 25 ppm, whichever is less stringent.
 [Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(6), and OAC rule 3745-77-07(A)(1)]



- (4) The average temperature of the exhaust gases immediately before the catalyst beds in the two oxidizers, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(I)(iii), and OAC rule 3745-77-07(A)(1)]

- (5) The catalytic oxidizers shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in the catalytic oxidizers, as determined during the catalytic activity test, shall be at least 90% at a test temperature that is representative of the normal temperature at the inlet to the catalytic oxidizers. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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

Table with 2 columns: 63.3094, Work Practice Standards

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitor(s) and recorder(s) which measure(s) and record(s) the temperature immediately upstream of each oxidizer's catalyst bed when the emissions unit is in operation. The temperature monitor(s) and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitations specified in b)(2)a, b)(2)b, and/or b)(2)c, the permittee shall implement a site-specific inspection and maintenance plan for the catalytic oxidizer as specified in d)(6).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall collect and record the following information for each month for this emissions unit:
a. The name and identification number of each material (coating, solvent, etc.) added to the dip tank.
b. The VOC content, in pounds VOC per gallon, excluding water and exempt solvents, of each material added to the dip tank.
c. The volume, in gallons (excluding water and exempt solvents), of each material added to the dip tank.



- d. The uncontrolled, monthly volume-weighted average VOC content of the materials added to the dip tank, in pounds VOC per gallon (excluding water and exempt solvents).
- e. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating, excluding water and exempt solvents. If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitation specified in b)(2)b, the controlled VOC emission rate shall be calculated using (i) the uncontrolled, monthly volume-weighted average VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance. If the emission reductions achieved by the catalytic oxidizer are not used by the permittee to demonstrate compliance with the limitation specified in b)(2)b, the controlled VOC emission rate shall be equal to the value recorded in d)(2)d.
- f. The total uncontrolled VOC emissions from all the materials added to the dip tank.
- g. The calculated, controlled VOC emissions from all the materials added to the dip tank, in pounds. If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitation specified in b)(2)c, the controlled VOC emission rate shall be calculated using (i) the total VOC emissions from d)(2)f 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. If the emission reductions achieved by the catalytic oxidizer are not used by the permittee to demonstrate compliance with the limitation specified in b)(2)c, the controlled VOC emission rate shall be equal to the value recorded in d)(2)f.
- h. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- i. The total number of days of operation of this emissions unit.
- j. The average daily VOC emission rate, in pounds (g/i).
- k. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst beds was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rules 3745-21-09(B)(3)(I)(iii), and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain monthly records of the total hours of production operation of the Elpo Dip System.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall perform a preventative maintenance inspection of the catalytic oxidizers on an annual basis to evaluate the performance of the catalyst bed. The inspection shall consist of internal and visual inspections and shall, at a minimum, include a physical inspection of the units and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations or best practices as determined by the permittee if the manufacturer is silent on appropriate inspection procedures. Repair and replacement of equipment shall be performed as necessitated by the inspection. A sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in term f)(4).

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each annual catalyst activity test required in term f)(4).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall collect, record and calculate the following information each month for the Cathodic EDP Prime Coating System (K017), Top Coat Process (K025), Primer Surfacer System (K026), Final Repair (K027), Facility Wide Sealers & Adhesives (K028 – glass bonding primer and adhesive only), as applicable under option from b)(1)d:
- a. the name and identification number of each coating, as applied;
 - b. the HAP content for each coating in pounds of HAPs per gallon of coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the volume of solids of each coating employed, in percent;
 - e. the volume of solids applied of each coating, in gallons (using the most recently determined transfer efficiencies); and
 - f. the combined HAP emissions limitation from all coatings employed, in pounds of HAP per gallons of solids applied (GSA).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Ohio EPA's Northeast District Office.

[Authority for term: 40 CFR Part 63, Subpart IIII, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (6) If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitations specified in b)(2)a, b)(2)b, and/or b)(2)c, the permittee shall implement a site-specific inspection and maintenance plan for the catalytic oxidizer. The plan must address the following:
- a. Monthly external inspection of the catalytic oxidizer system, including the burner assembly and fuel supply lines for problems and, as necessary, adjust the equipment to assure proper air-to-fuel mixtures.



- b. Annual internal inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found during the annual internal inspection of the catalyst, the permittee must replace the catalyst bed or take other corrective action(s) consistent with the manufacturer’s recommendations. If the catalyst bed is replaced and is not of like or better kind and quality as the old catalyst, then the permittee must conduct a new performance test to determine destruction efficiency according to f)(4). If a catalyst bed is replaced and the replacement catalyst is of like or better kind and quality as the old catalyst, then a new performance test to determine destruction efficiency is not required and the permittee may continue to use the previously established operating limits for the catalytic oxidizer.
- c. The permittee shall maintain a record of the results of each monthly and annual inspection of the catalytic oxidizer system and the catalyst bed, respectively.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: 40 CFR Part 63, Subpart IIII, OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3130 and 63.3131	Record Keeping Requirements
63.3163 and 63.3173	Demonstrating Continuous Compliance

[Authority for term: 40 CFR Part 63, Subpart IIII 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 calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the daily emission rate of 301 pounds of VOC was exceeded.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the monthly volume-weighted average VOC content limitation of 0.6 pound/gallon of coating, excluding water and exempt solvents, was exceeded.

[Authority for term: OAC rule 3745-31-05(A)(3) and 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 when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst beds did not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit a report identifying each time the catalyst bed was replaced with new material that shall include and define the type of catalyst bed that was installed in place of the old catalyst. The report shall also indicate if the catalyst bed is of like or better kind and quality in comparison to the old catalyst. The report shall be submitted with the next semiannual report.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall submit annual reports that identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall submit reports that include the results of the catalyst activity tests required in term f)(4). These reports shall be submitted within 45 days after each catalyst activity test is performed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall notify the Director of any monthly record showing any deviation from the following:

- a. an identification of all months during which the HAP emission limitation for K017, K025, K026, K027, and K028 (glass bonding primer and adhesive only) was exceeded (pound HAP per gallon of solids applied), per b)(1)d.



These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports that identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3120	required reports
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation:

The maximum daily emission rate for this emissions unit shall not exceed 301 pounds of VOC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

The VOC contents of the coatings employed in this emissions unit shall not exceed 0.6 pound of VOC per gallon of coating, excluding water and exempt solvents, on a monthly volume-weighted average basis.

The permittee shall not cause to be discharged into the atmosphere from this emissions unit, VOC emissions in excess of 0.17 kilogram of VOC per liter of applied solids, or 1.44 pounds of VOC per gallon of applied solids, on a monthly volume-weighted average basis.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]



c. Emission Limitation:

The total VOC emissions from this emissions unit, including cleanup materials, shall not exceed 45.2 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HAP limitation above based on the record keeping requirements in d)(5) and d)(7) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

- a. The emission testing shall be conducted within one year prior to permit expiration, or at approximately 5 year intervals starting with the date of the last test that demonstrated compliance.
- b. The emission testing shall be conducted to demonstrate compliance with the VOC control efficiency requirements specified in c)(3). If required by the Ohio EPA, VOC capture efficiency testing shall be conducted to demonstrate compliance with requirements specified in c)(2).
- c. The capture efficiency is based upon the results of a performance test conducted in April 1994 showing a capture efficiency greater than that required in c)(2). The Ohio EPA may require the test be redone if changes to the capture system occur.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the 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 alternative if such approval does not contravene any other applicable requirement.)

- 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 OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The permittee shall monitor the temperature immediately upstream of each oxidizer's catalyst bed during the performance test to establish an average temperature in accordance with c)(4) and d)(2)k.
- f. 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 Northeast District Office.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- h. Personnel from the Ohio EPA Northeast District Office 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.
- i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s).

[Authority for term: OAC rules 3745-15-04(A), 3745-21-10(A), 3745-21-10(C), 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 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 coating, 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.



The VOC content of each cleanup material used shall be based upon USEPA Method 24 or formulation data.

[Authority for term: OAC rule 3745-21-04(B)(5), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall conduct, or have conducted, annual catalyst activity testing using the catalyst sample collected during the annual preventive maintenance inspection described in d)(4). An intent to test notification shall not be required for the testing noted in this term.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



3. K025, Top Coat Process

Operations, Property and/or Equipment Description:

Top Coat Process basecoat and clearcoat

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	Overall Top Coat Process: 6.07 lbs of volatile organic compounds (VOC) per gallon of solids applied. VOC emissions shall not exceed 7174.2 lbs of VOC per day based on a daily average for each calendar month. VOC emissions shall not exceed 326.1 lbs per hour. See b)(2)e. Particulate emissions (PE) shall not exceed 9.5 lbs per hour. The emissions from the main thermal oxidizer exhaust stack shall not exceed the following: Nitrogen oxides emissions (NO _x) shall not exceed 3.1 pounds per hour. See b)(2)f. Carbon monoxide emissions (CO) shall not exceed 1.9 pounds per hour. See b)(2)a, b)(2)b, b)(2)c and b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-31-05(D), and OAC rule 3745-31-28.
b.	OAC rule 3745-31-05(D)	Annual Topcoat emissions shall not exceed: 941.0 tons of VOC per rolling, 12-month summation. PE emissions shall not exceed 27.4 tons per rolling, 12-month summation.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-21-09(C)(1)(c)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 60, Subpart MM	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-31-28	See b)(1)h.
h.	40 CFR Part 63, Subpart IIII	Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b). See b)(2)g, c)(4), d)(10) and e)(10).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.
j.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(1), c)(3), d)(1), d)(2), d)(8), d)(9), e)(2), e)(7), e)(8) and e)(9).

(2) Additional Terms and Conditions

- a. The Top Coat Process consists of two coating lines. There are two waterborne basecoat areas each with a heated flash off and two solvent borne clearcoat areas each followed by a curing oven. The heated flash offs and curing ovens shall be controlled by a thermal oxidizer. The two clearcoat booths shall be partially controlled by two VOC concentrators. The desorption of the concentrators use the same thermal oxidizer as the heated flash offs and ovens. These terms and conditions cover the entire top coat process. The two coating lines may operate separately. It is possible that one coating line, including a clear coat area, may use either of the VOC concentrators.
- b. The thermal oxidizer, associated with the basecoat flash off oven, the clearcoat VOC concentrator, and the top coat curing oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.
- c. The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight.
- d. The overall VOC capture efficiency for the clearcoat booth(s) operation shall be equal to or greater than 85 percent, by weight.
- e. The hourly limitation is based on the emissions unit's potential to emit after applying the capture and control efficiencies specified above. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this limitation.
- f. The hourly limitation is based on the emissions unit's potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this limitation. The annual NO_x and CO emissions for this emissions unit are accounted for in the terms for P025.



- g. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3100	General Compliance Requirements
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c) Operational Restrictions

- (1) The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rules 3745-21-09(B)(3)(I)(ii), 40 CFR Part 64, and OAC 3745-77-07(A)(1)]

- (2) The permittee shall operate the water wash filtration systems whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall operate a VOC concentrator when this emissions unit is in operation. This VOC concentrator shall have the following:

- a. an initial stationary layer of carbon;
- b. a rotating absorbent carbon wheel;
- c. an operating desorption fan; and
- d. a minimum desorption temperature which is 15 degrees below the average desorption gas inlet temperature that is established during the most recent emission test that demonstrated the emissions unit was in compliance.

If one coating line, including a clear coat area is being operated, either of the VOC concentrators must be operated, if both coating lines are being operated, both VOC concentrators must be operated.

[Authority for term: 40 CFR Part 64, OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

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

63.3094	Work Practice Standards
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. (The temperature recorder for the thermal oxidizer shall record the temperature data not less than once during each 15-minute period of operation of the thermal oxidizer.)

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. a log of operating time for the capture system, oxidizers, monitoring equipment and the associated emissions units, pursuant to OAC rule 3745-21-09(B)(4)(b)(i);
 - b. 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 established during the most recent emission test that demonstrated that the emissions unit was in compliance; and
 - c. all 3-hour blocks of time during which the average desorption gas inlet temperature, when the emissions unit was in operation, was below the minimum desorption gas inlet temperature established during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(I), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

- (3) 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 emission 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 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]



- (4) Pursuant to OAC rule 3745-21-09(C)(4), the permittee shall maintain records for the top coat process and primer surfacer system that will enable the permittee to calculate the HAPs emission rate in order to demonstrate compliance with the emission limitation identified in b)(1)h. above for the topcoat process and primer surfacer system 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 HAP emission rates for the topcoat operation and primer surfacer system in pounds of HAPs per gallon of solids applied, 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 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the rolling, 12-month summation of the monthly VOC emission rates (controlled), in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall document whether or not the water wash filtration systems were in service when the emissions unit was in operation. A monitoring system with alarms that shows no alarms could be sufficient documentation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall collect, record and calculate the following information each month for the Cathodic EDP Prime Coating System (K017), Top Coat Process (K025), Primer Surfacer System (K026), Final Repair (K027), Facility Wide Sealers & Adhesives (K028 – glass bonding primer and adhesive only), as applicable under option from b)(1)h:

- a. the name and identification number of each coating, as applied;
- b. the HAP content for each coating in pounds of HAPs per gallon of coating, as applied;
- c. the number of gallons of each coating employed;
- d. the volume of solids of each coating employed, in percent;
- e. the volume of solids applied of each coating, in gallons (using the most recently determined transfer efficiencies); and
- f. the combined HAP emissions limitation from all coatings employed, in pounds of HAP per gallons of solids applied (GSA).



¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall operate and maintain the following sensors, monitors and recorders associated with the VOC concentrator(s) when the emissions unit is in operation:
 - a. A motion sensor that will detect rotation of each adsorbent carbon wheel in the VOC concentrator. The sensor shall be connected to a system alarm that will notify the appropriate personnel that motion is not detected.
 - b. An operation sensor that will detect operation of the desorption fan(s), which controls air flow through the adsorbent carbon wheel(s). The sensor shall be connected to a system alarm that will notify the appropriate personnel when the fan is not in operation.
 - c. The desorption air inlet temperature shall be monitored and recorded to assure temperature is sufficient to cause desorption.

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

- (9) The permittee shall annually inspect the initial stationary layer of carbon in the VOC concentrator to check for structural integrity and surface buildup that could cause blockage to this portion of the control system.

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

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

63.3130 and 63.3131	Record Keeping Requirements
63.3163 and 63.3173	Demonstrating Continuous Compliance

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the calculated, controlled VOC emission rates exceed(s) the applicable pounds of VOC per gallon of solids limitation or the pounds of VOC per day limitation for the topcoat process. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit 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 Fahrenheit below the average temperature established during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

- (3) By February 15 of each year, and in accordance with sections 18, 21, and 23 of the U.S.EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof, the permittee shall submit to the Ohio EPA Northeast District Office a report which reviews the current operating conditions for this emissions unit and compares them to the conditions in existence at the time of the most recent transfer efficiency and capture efficiency tests.

If significant product, processing, material, or application equipment changes have occurred which necessitate a reevaluation of the transfer efficiency or capture efficiency for each operation which has been modified, the permittee shall complete the reevaluation and submit the results to the Ohio EPA Northeast District Office within 60 days following the completion of reevaluation testing.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the water wash filtration system was not in service when the emissions unit was in operation during production. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions exceeded 941 tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall notify the Director of any monthly record showing any deviation from the following:
- a. an identification of all months during which the HAP emission limitation for K017, K025, K026, K027, and K028 (glass bonding primer and adhesive only) was exceeded (pound HAP per gallon of solids applied), per b)(1)h.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports that identify all exceedances of the above limitations, as well as the corrective



actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall submit deviation (excursion) reports that identify all situations during which the VOC concentrator adsorbent carbon wheel motion sensor and/or the desorption fan operation sensor alarms were activated, when the emissions unit was in operation. It shall not be considered a deviation if the alarms are activated and the facility institutes proper strip out of the coating line(s).

Strip out is defined as allowing no new vehicles to enter the coating line(s) or booth(s). All vehicles that have already entered the basecoat area(s) are allowed to continue through the clearcoat area(s) and the oven(s).

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average desorption air inlet temperature, when the emissions unit was in operation, was below the minimum desorption air inlet temperature established during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(A)(1)]

- (9) The permittee shall submit an annual report covering inspection of the initial stationary layer of carbon in the VOC concentrator specified in d)(9).

[Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 64, and OAC rule 3745-77-07(C)(1)]

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

63.3120	Required Reports
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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



a. Emission Limitation:

Overall Top Coat Process emissions shall not exceed 6.07 lbs of VOC per gallon of solids applied.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitation above based on the record keeping requirements in d)(3) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

VOC emissions shall not exceed 326.1 lbs per hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above using emission tests performed in accordance with the methods and procedures specified in f)(2).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

VOC emissions shall not exceed 7,174.2 lbs per day, on a monthly average basis.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily allowable VOC emission limitation above based on the record keeping requirements in d)(3) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

VOC emissions shall not exceed 941 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based on the record keeping requirements in d)(5) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]



e. Emission Limitation:

PE emissions shall not exceed 9.5 lbs per hour and 27.4 tons per year.

Applicable Compliance Method:

Compliance shall be based on a one time calculation using the actual worst case emission rate for particulate emissions. The following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

where:

PE = particulate emission rate (lb/hr);

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; and

CE = control efficiency of the control equipment.

Tons per year are demonstrated by multiplying the hourly PE rate by the emissions units' actual operating schedule and dividing by 2000 lbs/ton.

If required, compliance with the hourly allowable PE limitation shall be demonstrated in accordance with the methods in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-17-03(B)(10), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)]

g. Emission Limitation:

HAP emissions shall not exceed either 0.30 lb HAP/gal coating solids deposited or 0.50 lb HAP/gal coating solids deposited, as per b)(1)h.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HAP limitation above based on the record keeping requirements in d)(7) and d)(10) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

h. Emission Limitation:

NO_x and CO emissions shall not exceed 3.1 lbs per hour of NO_x and 1.9 lbs per hour of CO from the thermal oxidizer stack.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NO_x and CO emission limitations above using emission tests performed in accordance with the methods and procedures specified in f)(2).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) 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 one year prior to permit expiration, or at approximately 5 year intervals starting with the date of the last test that demonstrated compliance.
 - b. The emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for the VOC emission rates from the thermal oxidized stack. Compliance with the CO and NO_x emission rates were demonstrated during the initial performance test (Feb. 2006).
 - c. The emission testing shall be conducted to demonstrate compliance by measuring the control efficiencies for VOC for the thermal oxidizer and the concentrator operated in association with this emissions unit.
 - d. 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 Northeast District Office.
 - e. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC's, Method 24 or 24A, and Method 25 or 25A of 40 CFR Part 60, Appendix A, formulation data, or any approved alternative test method.
 - f. If required, the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NO_x, Method 7 or 7E of 40 CFR Part 60, Appendix A, or any approved alternative test method, and for CO, Method 10 of 40 CFR Part 60, Appendix A or any approved alternative test method.
 - g. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their



total concentration, and on a consideration of the potential presence of interfering gases.

- h. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the 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 alternative if such approval does not contravene any other applicable requirement.)
- i. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- j. Personnel from the Ohio EPA Northeast District Office 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.
- k. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s).

[Authority for term: OAC rules 3745-15-04(A), 3745-21-10(A), 3745-21-10(C), 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) USEPA Method 24 shall be used to determine the analytical VOC contents of the coatings employed. If, pursuant to section 11.4 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 coating, 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. The permittee shall also use the formulation VOC as required by 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, December 1988) in b)(1).



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The VOC content of each cleanup material used shall be based upon USEPA Method 24 or formulation data.

[Authority for term: OAC rule 3745-21-04(B)(5), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



4. K026, Powder Primer Surfacer

Operations, Property and/or Equipment Description:

Primer Surfacer System powder coating - booth and oven

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	<p>Primer Surfacer emissions shall not exceed 0.13 lb of volatile organic compounds (VOC) per gallon of solids applied.</p> <p>VOC emissions shall not exceed 3.35 lbs per hour.</p> <p>See b)(2)a.</p> <p>VOC emissions shall not exceed 73.7 lbs per day based on a daily average for each calendar month.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-31-28.</p>
b.	OAC rule 3745-31-05(D)	Annual Primer Surfacer emissions shall not exceed 9.7 tons of VOC per rolling, 12-month summation.
c.	OAC rule 3745-21-09(C)(1)(a)(v)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-28 and 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-28	See b)(1)f.
f.	40 CFR Part 63, Subpart IIII	<p>Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b).</p> <p>See b)(2)b, c)(1), d)(4) and e)(6).</p>
g.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. The VOC hourly emission limitation is based on the emissions units' potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this emission limitation.
- b. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3100	General Compliance Requirements
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c) Operational Restrictions

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

63.3094	Work Practice Standards
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect, record, and calculate the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (in lbs/gallon or lb/lb, excluding water and exempt solvents), as applied;
 - c. the number of gallons or pounds of each coating employed;
 - d. the volume of solids of each coating employed, in percent;
 - e. the total volume of solids applied, in gallons (using the most recently determined transfer efficiencies);
 - f. the number of days the emissions unit was in operation;
 - g. the VOC emissions from all the coatings employed in pounds of VOC per gallons of solids applied ($b \times c \times d / e$);
 - h. the total VOC emissions from all the coatings employed ($b \times c$), in pounds; and
 - i. the average daily OC emission rate for all the coatings employed, i.e., (h/f), in pounds/day (average).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall collect, record and calculate the following information each month for the Cathodic EDP Prime Coating System (K017), Top Coat Process (K025), Primer Surfacer System (K026), Final Repair (K027), and Facility Wide Sealers & Adhesives (K028 – glass bonding primer and adhesive only), as applicable under option from b)(1)f:
 - a. the name and identification number of each coating, as applied;
 - b. the HAP content for each coating in pounds of HAPs per gallon of coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the volume of solids of each coating employed, in percent;
 - e. the volume of solids applied of each coating, in gallons (using the most recently determined transfer efficiencies); and
 - f. the combined HAP emissions limitation from all coatings employed, in pounds of HAP per gallons of solids applied (GSA).



¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3130 and 63.3131	Record Keeping Requirements
63.3163 and 63.3173	Demonstrating Continuous Compliance

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

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify any month during which the 0.13 pound VOC per gallon of coating solids applied emission rate is exceeded. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports that identify all times when the VOC emission rate from this emissions unit 73.7 pounds per day based on a daily average for each calendar month is exceeded. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit annual reports that identify any month during which the HAP emission limitation for emissions units K017, K025, K026, K027, and K028 (glass bonding primer and glass bonding adhesive only) was exceeded per b)(1)f (pound HAP per gallon of solids applied), as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous 12-month calendar period.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]



- (4) The permittee shall submit deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions exceeded 9.7 tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month limitation on jobs produced off of the final assembly was exceeded.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3120	Required Reports
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation:

Primer Surfacer emissions shall not exceed 0.13 lb of VOC per gallon of solids applied.

- Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitation above based on the record keeping requirements in d)(1) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

VOC emissions shall not exceed 73.7 lbs per day based on a daily average for each calendar month.



Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily allowable VOC emission limitation above based on the record keeping requirements in d)(1) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

Annual Primer Surfacer emissions shall not exceed 9.7 tons of VOC per rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based on the record keeping requirements in d)(3) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HAP limitation above based on the record keeping requirements in d)(2) and d)(4) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



5. K027, Final Repair

Operations, Property and/or Equipment Description:

Final Repair application booths and drying devices

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0119658)	Volatile organic compounds (VOC) emissions shall not exceed 160 lbs per day based on a daily average for each calendar month. VOC emissions shall not exceed 8.35 lbs per hour. See b)(2)b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-11(B), and OAC rule 3745-17-07(A).
b.	OAC rule 3745-31-05(D)	Annual final repair emissions shall not exceed 1.9 tons of particulate emissions (PE) per rolling, 12-month summation. VOC emissions shall not exceed 24 tons per rolling, 12-month summation.
c.	OAC rule 3745-21-09(C)(1)(d)	See b)(2)a.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 lb per hour. See d)(3).
e.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart IIII	<p>Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b).</p> <p>See b)(2)c., c)(2), d)(4) and e)(4).</p>
g.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. The VOC content of all the coatings employed shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
- b. The VOC hourly emission limitation is based on the emissions units' potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this emission limitation.
- c. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3100	General Compliance Requirements
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c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]



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

63.3094	Work Practice Standards
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect, record and calculate the following information for each month for this emissions unit:
- a. actual operating hours of the emissions unit;
 - b. the name and identification number of each coating, as applied;
 - c. the VOC content (excluding water and exempt solvents), the number of gallons of each coating, as applied, and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the monthly 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 or approved alternative;
 - e. the name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the VOC content of each cleanup material, in pounds per gallon;
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds;
 - i. the average daily VOC emission rate based on monthly usage for all the coatings employed, in pounds/day (average);
 - j. the total monthly emission rate, in tons; and
 - k. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3)and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall collect, record and calculate the following information each month for the Cathodic EDP Prime Coating System (K017), Top Coat Process (K025), Primer Surfacer System (K026), Final Repair (K027), and Facility-Wide Sealers & Adhesives (K028 – glass bonding primer and adhesive only), as applicable under option from b)(1)f:
- a. the name and identification number of each coating, as applied;



- b. the HAP content for each coating in pounds of HAPs per gallon of coating, as applied;
- c. the number of gallons of each coating employed;
- d. the volume of solids of each coating employed, in percent;
- e. the volume of solids applied of each coating, in gallons (using the most recently determined transfer efficiencies); and
- f. the combined HAP emissions limitation from all coatings employed, in pounds of HAP per gallons of solids applied (GSA).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3130 and 63.3131	Record Keeping Requirements
63.3163 and 63.3173	Demonstrating Continuous Compliance

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing that the monthly volume-weighted average VOC content (4.8 lbs VOC/gallon of coating) exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each record showing that the VOC limitation of 160 pounds of VOC/day based on a daily average for each calendar month was exceeded;
 - b. each month during which the rolling, 12-month PE exceeded 1.9 tons;



- c. each month during which the rolling, 12-month VOC emissions exceeded 24 tons; and
d. identification of any period of time (date and number of hours) when the dry filtration system was not in service during coating operations.

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

- (3) The permittee shall submit annual reports that identify any month during which the HAP emission limitation for emissions units K017, K025, K026, K027, and K028 (glass bonding primer and glass bonding adhesive only) was exceeded per b)(1)f (pound HAP per gallon of solids applied), as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous 12-month calendar period.

[Authority for term: OAC rule 3745-31-05(A)(3)and OAC rule 3745-77-07(C)(1)]

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

Table with 2 columns: 63.3120, Required Reports

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

f) Testing Requirements

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

a. Emission Limitation:

The VOC content of all the coatings employed shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping in d)(1). USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 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



coating, 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.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-04(B)(5), and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

VOC emissions shall not exceed 160 lbs per day based on a daily average for each calendar month.

Applicable Compliance Method:

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

U.S. EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-04(B)(5), and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

VOC emissions shall not exceed 24 tons per rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements in d)(1) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

PE shall not exceed 0.551 lb per hour.

Annual final repair emissions shall not exceed 1.9 tons of PE per rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon a one-time calculation using the actual worst case emission rate for particulate emissions. The following equation shall be used:

PE = maximum coating solids usage rate (in pounds per hour) X (1-TE) X (1-CE)



where:

PE = particulate emission rate (lb/hr);

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; and

CE = control efficiency of the control equipment.

Tons per year are determined by multiplying the hourly PE rate by the emissions unit actual operating hours and dividing by 2000 lbs/ton.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1), and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HAP limitation above based on the record keeping requirements in d)(2) and d)(4) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart IIII]

g) Miscellaneous Requirements

(1) None.



6. K028, Facility Wide Sealers & Adhesives

Operations, Property and/or Equipment Description:

Facility Wide Sealers and Adhesives

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	See b)(2)a. Volatile organic compounds (VOC) emissions shall not exceed 936 lbs per day based on a daily average for each calendar month. VOC emissions shall not exceed 49.5 lbs per hour. See b)(2)b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 143 tons per rolling, 12-month summation.
c.	OAC rule 3745-21-09(U)(1)(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).
d.	40 CFR Part 63, Subpart IIII (40 CFR 63.3090)	Adhesive and sealer materials: 0.010 lb HAP/lb [40 CFR 63.3090(c)] See d)(4) and e)(4).
e.	40 CFR Part 63, Subpart IIII (40 CFR 63.3090)	Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b). See b)(2)c, c)(1), d)(5) and e)(6).
f.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. The VOC content of all coating, sealer and adhesive employed in this emissions unit shall not exceed 0.3 pound of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
- b. The VOC hourly emission limitation is based on the emissions units' potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this emission limitation.
- c. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3100	General Compliance Requirements
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c) Operational Restrictions

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

63.3094	Work Practice Standards
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect, record and calculate the following information monthly for this emissions unit:
 - a. the name and identification number of each coating/adhesive/sealer, as applied;
 - b. the VOC content of each coating/adhesive/sealer, in pounds per gallon (or other appropriate units) excluding water and exempt solvents, the number of gallons (or other appropriate unit), of each coating/adhesive/sealer as applied, and the number of gallons (or other appropriate unit), excluding water and exempt solvents, of each coating/adhesive/sealer as applied;
 - c. the daily volume-weighted average VOC content of all coating/adhesive/sealer, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - d. the number of days the emissions unit was in operation;
 - e. the monthly VOC emissions from all coating/adhesive/sealers employed, in pounds; and
 - f. the average daily VOC emission rate for all coating/adhesive/sealer employed, i.e., (e/d), in pounds/day (average).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall collect, record and calculate the following information each month for the Cathodic EDP Prime Coating System (K017), Top Coat Process (K025), Primer Surfacer System (K026), Final Repair (K027), and Facility Wide Sealers & Adhesives (K028 – glass bonding primer and glass bonding adhesives only), as applicable under option from b)(1)e:
 - a. the name and identification number of each coating, as applied;
 - b. the HAP content for each coating in pounds of HAPs per gallon of coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the volume of solids of each coating employed, in percent;
 - e. the volume of solids applied of each coating, in gallons (using the most recently determined transfer efficiencies); and



- f. the combined HAP emissions limitation from all coatings employed, in pounds of HAP per gallons of solids applied (GSA).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall collect, record and calculate the following information each month for Facility Wide Sealers & Adhesives (K028 – not components of glass bonding systems), as applicable under option from b)(1)d:
 - a. the name and identification number of each sealer and adhesive, as applied;
 - b. the HAP content for each sealer and adhesive in pounds of HAPs per pound of material;
 - c. the number of pounds of each sealer and adhesive employed; and
 - d. the combined HAP emissions limitation from all sealer and adhesive employed, in pounds of HAP per pound of material applied.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3130 and 63.3131	record keeping requirements
63.3173 and 63.3173	Demonstrating Continuous Compliance

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

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports that identify all times when the VOC emission rate from this emissions unit exceeds 936 pounds per day based on a daily average for each calendar month. The notification shall include a copy of such



record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions exceeded 143 tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit annual reports that identify any month during which the HAP emission limitation for emissions units K017, K025, K026, K027, and K028 (glass bonding primer and glass bonding adhesive only) was exceeded per b)(1)e (pound HAP per gallon of solids applied), as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous 12-month calendar period.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit annual reports that identify any month during which the HAP emission limitation for Facility Wide Sealers & Adhesives (K028 – not components of glass bonding systems) was exceeded per b)(1)d (pound HAP per gallon of solids applied), as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and shall cover the previous 12-month calendar period.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

63.3120	Required Reports
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation:

The VOC content of all coating, sealer and adhesive employed in this emissions unit shall not exceed 0.3 pound of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.



Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitation above based on the record keeping requirements in d)(1) of this permit. USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 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 coating, 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.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-04(B)(5) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

VOC emissions shall not exceed 936 lbs per day based on a daily average for each calendar month.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the daily allowable VOC emission limitation above based upon the record keeping requirements in d)(1) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

VOC emissions shall not exceed 143 tons per rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements in d)(2) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Combined organic HAP emissions shall not exceed 0.30 pound per gallon of coating solids deposited during each month or, if the operating limits of 40 CFR 63.3092(a) or (b) are achieved, the permittee may either comply with the above limit or the combined organic HAP emissions shall not exceed 0.50 pound per gallon of applied coating solids used during each month, in accordance with the requirements specified in 40 CFR 63.3090(a) and (b).



Draft Title V Permit
General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HAP limitation above based on the record keeping requirements in d)(3) and d)(5) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

HAP emissions shall not exceed 0.010 lb HAP/lb of adhesives and sealers, as per b)(1)d.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HAP limitation above based on the record keeping requirements in d)(4) and d)(5) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



7. K033, Misc. Solvents

Operations, Property and/or Equipment Description:

Misc. Solvent Usage body wipe, purge, cleanup, etc.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	Organic compound (OC) emissions shall not exceed 266.7 tons/yr, based on a rolling, 12-month summation.
c.	40 CFR Part 63, Subpart IIII (40 CFR 63.3090)	See c)(1).
d.	40 CFR Part 63, Subpart A 40 CFR 63.1 – 63.15	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

63.3094	Work Practice Standards
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[Authority for term: 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification for each solvent employed;
 - b. the number of gallons of each solvent material employed;
 - c. the OC content of each solvent material, in pounds per gallon;
 - d. the number of gallons of each solvent material employed in basecoat purging;
 - e. the number of gallons of each solvent material employed in clearcoat purging;
 - f. the number of gallons of solvent material recovered in the topcoat system;
 - g. the calculated, controlled OC emission rate from all solvent materials employed in the topcoat system, (using capture and destruction efficiencies from the most recent test required in K025), in pounds or tons;
 - h. the OC emissions from each solvent material employed (other than those used in purging), in pounds;
 - i. the total OC emissions from all the solvent materials employed [summation of h for all non-purging solvents/2000 + g], in tons; and
 - j. the rolling, 12-month summation of the monthly OC emission rates, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each month during which the rolling, 12-month OC emissions exceeded 266.7 tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

OC emissions shall not exceed 266.7 tons/yr, based on a rolling, 12-month summation.



Draft Title V Permit
General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable OC emission limitation above based upon the record keeping requirements in d)(1) of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of the solvents.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



8. P025, Facility Wide Natural Gas

Operations, Property and/or Equipment Description:

Facility-Wide Natural Gas Usage

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	Particulate emissions (PE) shall not exceed 7.3 tons per rolling, 12-month summation. Volatile organic compounds (VOC) emissions shall not exceed 5.3 tons per rolling, 12-month summation. Sulfur dioxide (SO ₂) emissions shall not exceed 0.6 ton per rolling, 12-month summation. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-07(A)(1). See b)(2)a.
b.	OAC rule 3745-31-05(D)	Nitrogen oxides (NO _x) emissions shall not exceed 133.7 tons per rolling, 12-month summation. Carbon monoxide (CO) emissions shall not exceed 80.2 tons per rolling, 12-month summation.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The facility-wide process natural gas usage emissions unit consists of all natural gas-fired process and control equipment associated with the new paint shop. This does not include natural gas used in the new boilers associated with this permit to install.

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-31-05(A)(3) 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 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the amount of natural gas used by this emissions unit in standard cubic feet (scf);
- b. the total monthly emission rate for SO₂, CO, NO_x, PE and VOC, in tons; and
- c. the rolling, 12-month summation of the monthly for SO₂, CO, NO_x, PE and VOC emission rates, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]



- (2) The permittee shall submit deviation (excursion) reports that identify each month during which the rolling, 12-month SO₂, CO, NO_x, PE and VOC emissions exceeded the emission limitations in b)(1). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit an annual report that summarizes the following information:
- a. the annual amount of natural gas used in this emissions unit in scf; and
 - b. the total annual emissions of SO₂, CO, NO_x, PE and VOC from this emissions unit for the previous calendar year.

This report shall be submitted by January 31 of each year for operations during the previous calendar year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

SO₂ emissions shall not exceed 0.6 ton per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be based on a calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion, 0.6 lb of SO₂ per mmcf or manufacturer's data, and the monthly natural gas usage.

The rolling, 12-month summation shall be made using monthly emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

CO emissions shall not exceed 80.2 tons per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be based on a calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion, 84 lbs of CO per mmcf or manufacturer's data, and the monthly natural gas usage.



The rolling, 12-month summation shall be made using monthly emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

NO_x emissions shall not exceed 133.7 tons per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be based on a calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion, 140 lbs of NO_x per mmcf or manufacturer's data, and the monthly natural gas usage.

The rolling, 12-month summation shall be made using monthly emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

PE emissions shall not exceed 7.3 tons per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be based on a calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion, 7.6 lbs of PE per mmcf or manufacturer's data, and the monthly natural gas usage.

The rolling, 12-month summation shall be made using monthly emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

VOC emissions shall not exceed 5.3 tons per rolling, 12-month summation.

Applicable Compliance Method:

Monthly emissions shall be based on a calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion, 5.5 lbs of VOC per mmcf or manufacturer's data, and the monthly natural gas usage.

The rolling, 12-month summation shall be made using monthly emissions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

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



Draft Title V Permit
General Motors Company - Lordstown Complex
Permit Number: P0118611
Facility ID: 0278000199
Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)(1)]

- g) Miscellaneous Requirements
 - (1) None.