



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE:(614) 644-3020 FAX:(614) 644-2329

**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

December 03, 1998

**CERTIFIED MAIL**

ROSS COUNTY  
Kenworth Truck Company  
Ken Legner  
65 Kenworth Drive  
Chillicothe OH, 45601

RE: Permit To Install Number 06-4949

**ADMINISTRATIVE MODIFICATION**

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

98 DEC 10 AM 10:51  
O.E.P.A.  
S.E.D.O.

Very truly yours,

*Thomas G. Riggs*  
Thomas G. Riggs, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

Enclosure

cc: USEPA  
SEDO

**Permit To Install  
Terms and Conditions**

Date of Issuance: 12/03/98

Effective Date: 12/03/98

**MODIFICATION TO PERMIT TO INSTALL 06-4949**

Application Number: 06-4949

Facility ID: 0671010121

Permit Fee: \$0.00

Name of Applicant: Kenworth Truck Company

Address: 65 Kenworth Drive

City: Chillicothe, Ohio

Location of proposed source(s): 65 KENWORTH DRIVE  
CHILLICOTHE, OHIODescription of proposed source(s):  
CLASS 8 TRUCK ASSEMBLY PLANT MODIFICATION.

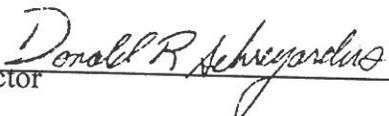
The Reason for the modification is:

**Modification to PTI #06-4949 issued 03/25/98, to change Applicable Federal & OAC Rule, page 5 of 14 from 3745-21-09 (U) (1) (a) (iii) to 3745-21-09 (U) (1) (c) for Unit K005, and add wording to source ID for K017 & K018, page 8 of 14.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

**PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

**PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

**APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

**BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for KENWORTH TRUCK COMPANY located in Ross County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001 (mod)	Frame assembly (build rate increase)	Compliance with OAC 3745-21-09 (U) (1) (c) and employing a method of coating to optimize the transfer efficiency. Compliance with the Air Toxics Policy. PM controlled by water wash.	3745-31-05 (A) (3) 3745-21-09 (U) (1) (c) 3745-21-10 (B) (7) (C <sub>voc,2</sub> ) 3745-21-10 (B) (9) (C <sub>voc,2</sub> ) A 3745-17-07 3745-17-11 3745-15-06	The volatile organic compound content of coatings employed in this source must not exceed 3.5 pounds per gallon of coating. VOC is limited to 200.0 lbs/hr and 174.0 tons/year. Particulate matter is limited to 2.58 lbs/hr and 11.3 TPY.
K002 (mod)	Research and development booth (build rate increase)	Compliance with OAC 3745-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by exhaust filters.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-17-07 3745-17-11 3745-15-06	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. *See below.
K003 (mod)	Touch up #1 (south) (build rate increase)	Compliance with OAC 3745-21-09 (U) Compliance	3745-31-05 (A) (3) 3745-21-09 (U) 3745-17-07	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K003 cont.		with the Air Toxics Policy. PM controlled by exhaust filters.	3745-17-11 3745-15-06	ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. See below.
K004 (mod)	Touch up #2 (north) (build rate increase)	Compliance with OAC 3745-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by exhaust filters.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06 3745-17-07 3745-17-11	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. See below.
K005 (mod)	#1 Cab booth (build rate increase)	Compliance with OAC 3745-21-09 (U) (1) (c) and employing a method of coating to optimize the transfer efficiency. Compliance with the Air Toxics Policy. PM controlled by water wash.	3745-31-05 (A) (3) 3745-21-09 (U) (1) (c) 3745-21-10 (B) (7) (C <sub>voc,2</sub> ) 3745-21-10 (B) (9) (C <sub>voc,2</sub> ) A 3745-17-07 3745-17-11 3745-15-06	The volatile organic compound content of the coatings employed in this source must not exceed 3.5 pounds per gallon of coating. VOC is limited to 200.0 lbs/hr and 80.0 tons/year. Particulate matter is limited to 2.58 lbs/hr and 11.3 TPY.
K006 (mod)	#2 Cab booth (build rate increase)	Compliance with OAC 3745-21-09 (U) (1) (c) and employing a method of coating	3745-31-05 (A) (3) 3745-21-09 (U) (1) (c) 3745-21-10 (B) (7) (C <sub>voc,2</sub> )	The volatile organic compound content of the coatings employed in this source must not exceed 3.5 pounds per

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K006 cont		to optimize the transfer efficiency. Compliance with the Air Toxics Policy. PM controlled by water wash.	3745-21-10 (B) (9) (C <sub>voc,2</sub> ) A 3745-17-07 3745-17-11 3745-15-06	gallon of coating. VOC is limited to 200.0 lbs/hr and 80.0 tons/year. Particulate matter is limited to 2.58 lbs/hr and 11.3 TPY.
K007 (mod)	#3 Cab booth (build rate increase)	Compliance with OAC 3745-21-09 (U) (1) (c) and employ- ing a method of coating to optimize the transfer efficiency. Compliance with the Air Toxics Policy. PM controlled by water wash.	3745-31-05 (A) (3) 3745-21-09 (U) (1) (c) 3745-21-10 (B) (7) (C <sub>voc,2</sub> ) 3745-21-10 (B) (9) (C <sub>voc,2</sub> ) A 3745-17-07 3745-17-11 3745-15-06	The volatile organic compound content of the coatings employed in this source must not exceed 3.5 pounds per gallon of coating. VOC is limited to 200.0 lbs/hr and 80.0 tons/year. Particulate matter is limited to 2.58 lbs/hr and 11.3 TPY.
K010 (mod)	Cab touch up booth, binks (build rate increase)	Compliance with OAC 3745-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by exhaust filters.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06 3745-17-07 3745-17-11	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. *See below.
K011 (mod)	E-coat system (formerly called Small Parts Paint	Compliance with OAC 3745-21-09 (U) (i) (c)	3745-31-05 (A) (3) 3745-21-09 (U) (1) (c)	The volatile organic compound content of coatings employed

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Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K011 (mod)	System) (build rate increase)	Compliance with the Air Toxics Policy	3745-21-10 (B) (7) (C <sub>voc,2</sub> ) 3745-21-10 (B) (9) (C <sub>voc,2</sub> ) A 3745-15-06	in this source must not exceed 3.5 pounds per gallon of coating. VOC is limited to 50.0 lbs/hr and 20.0 tons/year. [The E-Coat system is a dip tank using water based paints. Pigment and Resin are added periodically as testing indicated. Assigning an hourly limit is extremely difficult because of the nature of the operation. Under the current operating permit the hours of operation are recorded, and when pigment or resin is added, then an average emission is back calculated.]
K016 (mod)	#4 BC cab booth (build rate increase)	Compliance with OAC 3745-21-09 (U) (1) (c) and employ- ing a method of coating to optimize the transfer efficiency. Compliance with the Air Toxics Poli- cy. PM con- trolled by water wash.	3745-31-05 (A) (3) 3745-21-09 (U) (1) (c) 3745-21-10 (B) (7) (C <sub>voc,2</sub> ) 3745-21-10 (B) (9) (C <sub>voc,2</sub> ) A 3745-17-07 3745-17-11 3745-15-06	The volatile organic compound content of the coatings employed in this source must not exceed 3.5 pounds per gallon of coating. VOC is limited to 200 lbs/hr and 80.0 tons/year. Particulate matter is limited to 2.58 lbs/hr and 11.3 TPY.

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Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K017	New touch up booth No. 3 with oven	Compliance with OAC 3475-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by exhaust filters.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06 3745-17-07 3745-17-11	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. *See below.
K018	New touch up booth No. 4 with oven	Compliance with OAC 3475-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by exhaust filters.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06 3745-17-07 3745-17-11	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. *See below.
K019	New cab touch up booth, TKS	Compliance with OAC 3475-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by exhaust filters.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06 3745-17-07 3745-17-11	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. *See below.
K020	New Fiberglass Repair Booth	Compliance with OAC 3745-21-09 (U); Compliance	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K020 cont.		with the Air Toxics Policy. PM controlled by exhaust filters.	3745-17-07 3745-17-11	ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. *See below.
K021	New paint mix room	Compliance with OAC 3745-21-09 (U); Compliance with the Air Toxics Policy.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. [The paint mix room is where the paint is prepared for the paint booths. No paint is sprayed in this room. Solvent is used to clean up the equipment.]
R010 (mod)	Undercoating booth (build rate increase)	Compliance with OAC 3745-21-09 (U); Compliance with the Air Toxics Policy. PM controlled by water wash.	3745-31-05 (A) (3) 3745-21-09 (U) 3745-15-06 3745-17-07 3745-17-11	VOC is limited to 50.0 lbs/hr and 20.0 tons/year. This source shall use no more than ten gallons per day of volatile organic materials. Particulate matter is limited to 0.551 lb/hr and 2.41 TPY. [The undercoating booth is a solvent wipe operation prior to washing the cabs. The hand wipe is necessary to remove dirt and grime that the

Ohio EPA Source Number	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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washer cannot remove. Under the current operating permit the amount of solvent used per shift is recorded, then an average hourly emission is back calculated.]

\* Kenworth requested to use OAC 3745-21-09 (U) (e) (ii) which allows for up to 10 gallons of non-compliant 3.5 pounds VOC/gal paint to be used in the booths.

The operations in these booths are done to repair and/or touch up paint on finished cabs and trucks. As such, the quantities of paint used in these booths is extremely small. The small quantities present difficulty in keeping hourly records. Kenworth is requesting that a daily limit be accepted for these booths, as allowed by OAC 3745-21-09. The compliance determination method shall be a daily calculation.

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Net Emissions Increase Tons/Year</u>
VOC	335	195.8
Particulate Matter	78.14	4.5954
PM <sub>10</sub>	0.078	0.0046

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

- A. Recordkeeping and Reporting Requirements [units exempt for OAC 3745-21-09(U)]
1. The permittee shall collect and record the following information each day for the coating lines K002, K003, K004, K010, K011, R010, K017, K018, K019:

- a. the name and identification number of each coating employed;
  - b. the VOC content of each coating, as applied, in pounds per gallon;
  - c. the volume, in gallons of each coating employed; and,
  - d. the total volume, in gallons, of all of the coatings employed.
2. The permittee shall collect and record the following information each month:
- a. the name and identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the VOC content of each cleanup material, in pounds per gallon; and,
  - d. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month.

The permittee shall notify the Director of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the Director within 45 days after the exceedance occurs.

**B. Recordkeeping and Reporting Requirements (units complying)**

1. The permittee shall collect and record the following information each day for the lines K001, K005, K006, K007, K016, K020, and K021:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and,
  - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B) (9) of OAC rule 3745-21-10 for  $C_{voc,2}$ .

2. The permittee shall collect and record the following information each month:
  - a. the name and identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the VOC content of each cleanup material, in pounds per gallon; and,
  - d. the total VOC emissions from all coatings and cleanup materials, in pounds or tons per month.

The permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. A copy of such record shall be sent to the Director within 45 days after the exceedance occurs.

**C. Annual Coating Usage Limitations**

1. The coating and clean-up material usage shall be limited such that the maximum annual VOC usage for this emissions unit shall not exceed 335.0 tons, based upon a rolling, 12-month summation of the VOC content of coating and clean-up usage figures.

To ensure enforceability during the first 12 calendar months of operation following issuance of the permit to install, the permittee shall not exceed the VOC usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Usage (from Coating and Clean-up)</u>
1	
1-2	35.0 tons
1-3	61.0 tons
1-4	90.0 tons
1-5	118.0 tons
1-6	145.0 tons
1-7	173.0 tons
1-8	200.0 tons
1-9	228.0 tons
1-10	255.0 tons
1-11	281.0 tons
1-12	308.0 tons
	335.0 tons

After the first 12 calendar months of operation following issuance of the permit to install, compliance with the annual VOC usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

**D. Recordkeeping and Reporting Requirements**

1. The permittee shall maintain monthly records of the following information:
  - a. the VOC usage for each month; and,
  - b. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC usage figures.

Also, during the first 12 calendar months of operation following issuance of this permit, the permittee shall record the cumulative VOC usage for each calendar month.

The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative VOC usage levels.

**E. Testing Requirements**

1. Formulation data on USEPA Method 24 (for coatings) shall be used to determine the VOC content of coatings.

**F. Permit to Install Replacement**

1. This permit to install replaces all other permits to install that have been issued for the coating operations at the Kenworth Truck Company. The new allowable emission rates given in this permit to install for the existing sources K001, K002, K003, K004, K005, K006, K007, K010, K011, K016, and R010 and the new emission sources K017, K018, K019, K020, K021 must be followed at all times. No allowable emission rates for these sources given in any other permit to install prior to the issuance of this permit are valid after the definition of installation and/or modification has been met by these sources.

**G. Compliance with Malfunction Rules**

1. If at any time the control equipment should malfunction or be shut down, Kenworth will comply with the requirements of OAC 3745-15-06 Malfunction of Equipment, Scheduled Maintenance and Reporting.