



State of Ohio Environmental Protection Agency

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7/30/2009

Certified Mail

Mr. Richard Smallets
Magna Steyr - Toledo Paint Facility
Chrysler LLC Supplier Park
3800 Stickney Avenue
Toledo, OH 43608

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448011731
Permit Number: P0104249
Permit Type: Administrative Modification
County: Lucas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

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 in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
TDES; Michigan; Indiana; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Magna Steyr - Toledo Paint Facility

Issue Date: 7/30/2009
Permit Number: P0104249
Permit Type: Administrative Modification
Permit Description: Administrative modification to remove stack testing language for K404 and K405
Facility ID: 0448011731
Facility Location: Magna Steyr - Toledo Paint Facility
Chrysler LLC Supplier Park, 3800 Stickney Avenue
Toledo, OH 43608
Facility Description: Automobile Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This is an administrative modification to PTI 04-01358. In January, 2008, PTI 04-01358 was modified to add two automotive off-line repair booths equipped with dry filtration and natural gas ovens (spovens), which were initially permitted as K404 and K405 in PTI 04-01359 (final assembly plant permit) because the two units were actually constructed at the paint shop facility instead of at the final assembly plant. The off-line repair booths consist of a combination spray booth and oven (spoven) for off-line manual spray painting of vehicles blemished during the assembly process. The VOC emissions from the spoven are uncontrolled. Paint overspray is controlled with a dry filtration system. In the January 31, 2008 modification, stack testing language was incorrectly added for these two units. Magna Steyr requested this permit modification to remove the stack testing language.

3. Facility Emissions and Attainment Status:

Lucas County is classified as attainment for all criteria pollutants.

Facility Emissions:

CO	237.3 tpy
PM10	23.27 tpy
PE	16.92 tpy
VOC	310.88 tpy
NOx	89.42 tpy
SO2	10.68 tpy

4. Source Emissions:

K404 and K405 – Automotive off-line repair booths with dry filtration

K404: Repair booth filter exhaust stack

PE: $(0.551 \text{ lb/hr PE} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 2.4 \text{ tpy PE}$
PM10: $(0.0015 \text{ gr/dscf} * 11,000 \text{ cfm} * 60 \text{ min/hr} * 8760 \text{ hr/yr}) / (7000 \text{ gr/lb} * 2000 \text{ lb/ton}) = 0.62 \text{ tpy PM10}$
VOC: $(4.8 \text{ lb VOC/gal} * 6000 \text{ gal}) / 2000 \text{ lb/ton} = 14.5 \text{ tpy VOC}$

K404: Combustion gas exhaust stack

CO: $(0.083 \text{ lb CO/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 1.9 \text{ tpy CO}$
NOx: $(0.085 \text{ lb NOx/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 1.9 \text{ tpy NOx}$
PE: $(0.0019 \text{ lb PE/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.05 \text{ tpy PE}$
PM10: $(0.0075 \text{ lb PM10/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.17 \text{ tpy PM10}$
SO2: $(0.0006 \text{ lb SO2/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.02 \text{ tpy SO2}$
VOC: $(0.0054 \text{ lb NOx/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.12 \text{ tpy VOC}$

K404: Sanding and Coating Operations

PM10: $(0.0015 \text{ gr/dscf} * 11,000 \text{ cfm} * 60 \text{ min/hr} * 8760 \text{ hr/yr}) / (7000 \text{ gr/lb} * 2000 \text{ lb/ton}) = 0.62 \text{ tpy PM10}$

VOC: $(4.8 \text{ lb VOC/gal} * 6000 \text{ gal}) / 2000 \text{ lb/ton} = 14.5 \text{ tpy VOC}$

K405: Repair booth filter exhaust stack

PE: $(0.551 \text{ lb/hr PE} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 2.4 \text{ tpy PE}$

PM10: $(0.0015 \text{ gr/dscf} * 11,000 \text{ cfm} * 60 \text{ min/hr} * 8760 \text{ hr/yr}) / (7000 \text{ gr/lb} * 2000 \text{ lb/ton}) = 0.62 \text{ tpy PM10}$

VOC: $(4.8 \text{ lb VOC/gal} * 6000 \text{ gal}) / 2000 \text{ lb/ton} = 14.5 \text{ tpy VOC}$

K405: Combustion gas exhaust stack

CO: $(0.083 \text{ lb CO/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 1.9 \text{ tpy CO}$

NOx: $(0.085 \text{ lb NOx/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 1.9 \text{ tpy NOx}$

PE: $(0.0019 \text{ lb PE/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.05 \text{ tpy PE}$

PM10: $(0.0075 \text{ lb PM10/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.17 \text{ tpy PM10}$

SO2: $(0.0006 \text{ lb SO2/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.02 \text{ tpy SO2}$

VOC: $(0.0054 \text{ lb NOx/mmBtu} * 5 \text{ mmBtu/hr} * 8760 \text{ hrs/yr}) / 2000 \text{ lb/ton} = 0.12 \text{ tpy VOC}$

K405: Sanding and Coating Operations

PM10: $(0.0015 \text{ gr/dscf} * 11,000 \text{ cfm} * 60 \text{ min/hr} * 8760 \text{ hr/yr}) / (7000 \text{ gr/lb} * 2000 \text{ lb/ton}) = 0.62 \text{ tpy PM10}$

VOC: $(4.8 \text{ lb VOC/gal} * 6000 \text{ gal}) / 2000 \text{ lb/ton} = 14.5 \text{ tpy VOC}$

5. Conclusion:

Because the changes in emissions under PSD review are insignificant and neither Chrysler nor Magna Steyr requested a change in emissions, this permit should be processed with only the deletion of the stack testing language included in the permits for K404 and K405.

6. Please provide additional notes or comments as necessary:

This modification removes the stack testing language. And, because Ohio EPA has changed the format of air permits since the last modification, minor changes have been incorporated to bring the permit language up to current formatting standards. The PSD analysis was reviewed and no changes are required, as explained below.

The historical background of this PTI is as follows:

Chrysler, LLC owns and operates an automobile manufacturing plant in Toledo, Ohio. In 2004 Chrysler (at that time DaimlerChrysler) developed a "Suppliers Park" assembly plant/complex adjacent to two existing facilities; the Toledo North Assembly Plant (TNAP) and the Stickney Ave Plant (0448010414). The new complex consists of four separate buildings operated by four separate entities: a body shop, paint shop, rolling chassis, and final assembly facilities. Four separate PTI numbers and three new premise numbers for the main portions of the vehicle manufacturing operations were established, as follows:

PTI 04-01356 - rolling chassis (0448011729 Toledo Supplier Park - Rolling Chassis)

PTI 04-01357 - body shop (0448011730 KUKA)

PTI 04-01358 - paint shop (0448011731 Magna Steyr)

PTI 04-01359 - final assembly (0448010414 Chrysler)

Magna Steyr operates the paint shop facility located adjacent to Daimler Chrysler's Toledo North Assembly Plant and Stickney Avenue Plant. Now that construction of each plant is complete, the Title V permits are being prepared for each of the facilities.

During Magna Steyr's review of a pre-draft copy of the Title V permit, they discovered that stack testing language for PE and PM10 had inappropriately been included in the PTI modification (1/31/2008) for these two permits. In December, 2008, Magna Steyr brought the error to our attention and this office agreed that the stack testing language was inappropriate for these two units because the units are not on the

production line; rather they are off-line repair booths with insignificant PE emissions. A review of the engineering write-up for the original PTI 04-01359 (K404 and K405 were originally permitted under 04-01359 to be installed at the final assembly plant) indicated that the intermittent use of these booths, and was an accepted justification for no demonstration of compliance by stack testing. In January, 2008, PTI 04-01358 was modified to move K404 and K405 to Magna Steyr's permit because the two units were actually constructed at the paint shop facility instead of at the final assembly plant.

Upon further review, this office determined that the transfer of emissions units K404 and K405 from PTI 04-01359 (Chrysler) to PTI 04-01358 (Magna Steyr) did not properly account for an increase in the total allowable emissions of Magna Steyr's facility, i.e., when the units were transferred, the facility-wide allowable annual emissions limitations should have increased and Chrysler's should have decreased. On review, it appears that the change in facility-wide emissions would not significantly affect Magna Steyr's allowables, and this permit modification may be completed without changing the facility-wide allowable limitations. Both Magna Steyr and Chrysler were contacted to allow them to consider whether a change in the emissions limitations was desirable. Neither facility objected therefore, the facility-wide allowable annual emissions have not been changed as a part of this modification.

The initial permits to install were issued with the following allowable emissions:

tons per year	EU	CO	NOx	PE	PM10	SO2	VOC	
paint shop (0401358)	B301	36.40	37.89	0.66	3.65	9.19	2.36	
	B302			2.4				
	B303			0.49				
	K301			0.05	0.05			2.1
	K302			0.05	0.05			0.05
	K303			21	35.86			300.6
	P301	-	-	-	-	-	47.7	
	P302	-	-	-	-	-	160.6	
	P303	-	-	-	-	-	77.0	
	P304	-	-	-	-	-	8.3	
	P305	-	-	-	2.25	0.75	-	-
	subtotal	36.40	37.89	26.90	40.36	9.19	598.71	
final assembly (04-1359)	B401	11.56	12.44	0.66	1.41	9.01	0.74	
	B402			0.83				
	F401	-	-	-	14	2.8	-	-
	G401	-	-	-	-	-	-	3.1
	K401	-	-	-	2.4	1.85	-	16.5
	K402				4.8			
	K403				4.8			

tons per year	EU	CO	NOx	PE	PM10	SO2	VOC
	K404			4.8			
	K405			4.8			
	K406	-	-	2.4		-	
	K407	-	-	2.4		-	
	K408	-	-	1.1	0.85	-	19.3
	K409	-	-	-	-	-	0.4
	P401						10.0
	P402						7.0
	subtotal	11.56	12.44	28.99	6.91	9.01	57.04

As constructed, emissions units K404 and K405 were installed in the paint shop, not the final assembly building. This change from the preliminary plan was expressed by modifications to PTIs 04-01358 and 04-01359 in 1/31/2008 wherein the emissions unit terms and conditions were transferred from one facility to another (from 0448010414 Chrysler to 0448011731 Magna Steyr). Unfortunately the joint limitations for the emissions associated with these two emissions units were not revised in the table above for the individual facilities, and the individual restrictions which form the basis of the PSD review for this permit may have been invalidated.

Chrysler LLC and Magna Steyr were contacted to allow them the opportunity to request that the allowable limitations for PM10 and VOC expressed in PTI 04-1359 (Chrysler) be revised to transfer those emissions of K404 and K405, appropriately restricted by the joint limitations of the terms and conditions of K401 through K407 to PTI 04-1358 (Magna Steyr).

In the evaluation of K404 and K405 the original permit lists K402 thru K405 as Low Bake Repair: as follows: "General description - Low bake repair consists of a "spoven" (combination spray booth and oven) for off-line manual spray painting of vehicles blemished during the assembly process. The VOC emissions from the spoven will be uncontrolled. Paint overspray will be controlled with a dry filtration system."

Permit allowable emissions from these coating operations was at set 4.8 pounds of VOC per gallon as a daily volume weighted average of coating and 5% opacity. Chrysler requested 1.85 tons PM10 per year and 14 tons per year maximum total VOC from the coating operations in low bake repair (K001-K005), 2.0 in interior touch-up (K406) and 0.5 tpy VOC in the clean shop repair (K407). Since no potential emissions are listed for the PM10 emissions from K401, K406 or K407, a joint allowable was set at 1.85 tpy PM10 and 16.5 tons per year VOC.

Chrysler submitted data in table 5-1 for a one time calculation demonstrating the combined potential to emit from K401 through K405:

0.0761 gallon/vehicle basecoat (1.78 pounds VOC/gallon) = 0.1354 pound VOC/vehicle
0.0003 gallon/vehicle clearcoat (4.05 pounds VOC/gallon) = 0.0012 pound VOC/vehicle
0.0006 gallon/vehicle misc prime (5.30 pounds VOC/gallon) = 0.0032 pound VOC/vehicle
0.1398 pound VOC/vehicle
0.14 pound VOC/vehicle (82 vehicles/hour) = 12 pounds VOC/hour

The BAT determination For K404 and 405 was the same as K401 with the addition of the emissions of a 5 mmBtu/hr burner. Chrysler agreed to use the lowest NOx burners that are commercially available for the oven. BAT was set at previous determined BAT/BACT/LEAR small burner levels of:

lb/mmBtu natural gas	CO	NOx	PE	PM10	SO2	VOC
	0.083	0.085	0.0019	0.0075	0.0006	0.0054

and 5% opacity for the indirect fired infra-red oven burner emissions. Chrysler requested facility-wide federally enforceable emissions limitations for the final assembly building for the natural gas and fuel oil combustion at 258 mmscf/yr and 1020 Btu/scf:

	CO	NOx	PE	PM10	SO2	VOC
total (tons)	11.56	12.44	-	1.41	9.01	0.74

With restrictions PTE is equal to the permit allowable emissions. The PTE for each 5 mmBtu oven burner is:

tpy	CO	NOx	PE	PM10	SO2	VOC
	1.9	1.9	0.05	0.17	0.05	0.12

Sanding operations are not mentioned, and was assumed to be minimal, however since they were not specifically addressed BAT was established as enclosure and dry filtration with 98% effective control and a maximum 5% opacity.

Chrysler wishes to comply with monthly record keeping when complying with compliance coatings, and daily records when compliance is by volume averaging. The intermittent use of the booth, and the method of setting the emissions limitation (gr/dscf) as if in constant use, has been presented as a justification for no demonstration of compliance by stack testing.

K406 and K407 were similarly demonstrated to have PTE's of 1.7 and 0.40 pounds per hour respectively:

0.0039 gallon/vehicle (5.12 pounds VOC/gallon) = 0.020 pound VOC per vehicle
 0.020 pound VOC per vehicle (82 vehicles/hour) = 1.7 pound VOC/hour
 0.0010 gallon/vehicle (4.80 pounds VOC/gallon) = 0.0048 pound VOC per vehicle
 0.0048 pound VOC per vehicle (82 vehicles/hour) = 0.40 pound VOC/hour

these limitations will be set as joint for K401 thru K405, and individually for K406 and K407.

At 1.85 tpy PM10 for 200,064, PM10 emissions may be equated to 0.0185 pound of PM10 per vehicle. At a maximum 82 vehicles per hour this equates to 1.6 lb/hr.

Chrysler wishes to rely on monthly record keeping when complying with compliance coatings, and daily records when compliance is by volume averaging. The intermittent use of the booth, and the method of setting the emissions limitation as if in constant use (over-estimating the individual source's emissions), has been presented as a justification for no demonstration of compliance by stack testing. All joint emission limitations represent the potential to emit for all sources based on the annual production of 200,064 vehicles.

Sanding operations are not mentioned, and may be minimal, however since they were not specifically addressed BAT will be enclosure and dry filtration with 98% effective control (section 4.1.2.3 and Table 4-3). This will result in a separate emissions limitation of 0.551 lb/hr which equates to 2.4 tpy at 8760 hours per year for PE. The limit for PM10 for this source will be set at 1.6 lb/hr and equal to the maximum joint limitation at 1.85 ton per year. If the sanding and painting are performed in the same enclosure and controlled with one dry filtration system, these allowable emissions would not be additive.

Potential to emit - With restrictions PTE is equal to the permit allowable emissions.

Actual emissions - Actual emissions for all emissions will be estimated as 5% of the allowable emissions = 0.12 tpy PE, 0.09 tpyPM10, 0.73 tpy VOC.

Other applicable regulations - CEMs are not applicable. Offsets will be needed (see emission summary and Offset discussion in Section 4.2 beginning on page 38 of PTI application). Modeling is discussed in the permit application technical support document.

Potential to emit - With restrictions PTE is equal to the permit allowable emissions. The PTE for each 5 mmBtu oven burner is:

	CO	NOx	PE	PM10	SO2	VOC
tpy	1.9	1.9	0.05	0.17	0.05	0.12

This review confirms that the total change would not significantly increase the allowable emissions at the Magna Steyr facility. Therefore, the requested permit modification to remove the stack testing language can be completed without changing the allowable limitations.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	237.3 (no change)
PM10	23.27 (no change)
PE	16.92 (no change)
VOC	310.88 (no change)
NOx	89.42 (no change)
SO2	10.68 (no change)



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

Air Pollution Permit-to-Install
for
Magna Steyr - Toledo Paint Facility

Facility ID: 0448011731
Permit Number: P0104249
Permit Type: Administrative Modification
Issued: 7/30/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Magna Steyr - Toledo Paint Facility

Table of Contents

- Authorization 1
- A. Standard Terms and Conditions 3
 - 1. Federally Enforceable Standard Terms and Conditions 4
 - 2. Severability Clause 4
 - 3. General Requirements 4
 - 4. Monitoring and Related Record Keeping and Reporting Requirements 5
 - 5. Scheduled Maintenance/Malfunction Reporting 6
 - 6. Compliance Requirements 6
 - 7. Best Available Technology 7
 - 8. Air Pollution Nuisance 7
 - 9. Reporting Requirements 7
 - 10. Applicability 8
 - 11. Construction of New Sources(s) and Authorization to Install 8
 - 12. Permit-To-Operate Application 9
 - 13. Construction Compliance Certification 9
 - 14. Public Disclosure 9
 - 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
 - 16. Fees 9
 - 17. Permit Transfers 10
 - 18. Risk Management Plans 10
 - 19. Title IV Provisions 10
- B. Facility-Wide Terms and Conditions 11
- C. Emissions Unit Terms and Conditions 13
 - 1. Emissions Unit Group - Rapid Reprocess 1 and 2: K404, K405, 14



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011731
Facility Description: Paint Shop portion of Automotive and Light Duty Truck Supplier Park
Application Number(s): M0000343
Permit Number: P0104249
Permit Description: Administrative modification to remove stack testing language for K404 and K405
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/30/2009
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Magna Steyr - Toledo Paint Facility
Chrysler LLC Supplier Park
3800 Stickney Avenue
Toledo, OH 43608

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104249

Permit Description: Administrative modification to remove stack testing language for K404 and K405

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Rapid Reprocess 1 and 2

Emissions Unit ID:	K404
Company Equipment ID:	Rapid Reprocess #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K405
Company Equipment ID:	Rapid Reprocess #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

Facility ID: 0448011731

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. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. 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 re-issuance, or modification.



- 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.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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 ORC section 3704.08.
 - (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.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. 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



(i.e., postmarked) 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

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

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 (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

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C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Rapid Reprocess 1 and 2: K404, K405,

EU ID	Operations, Property and/or Equipment Description
K404	Automotive off-line repair booth with dry filtration (SPOVEN)
K405	automotive off-line repair booth with dry filtration (SPOVEN)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
automotive off-line repair booth with dry filtration		
a.	OAC rule 3745-31-05(A)(3)	2.4 tons of particulate emissions (PE) per year, 0.62 tons of PM10 per year, 14.5 tons of volatile organic compounds (VOC) per year, 5% opacity as a 6-minute average, and see b)(2)a., b., and q.
b.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
c.	OAC rule 3745-17-11(B)(1)	0.551 pound PE per hour.
d.	OAC rule 3745-21-09(C)(1)(d)	See b)(2)d.
e.	OAC rules 3745-31-10 thru 20	0.0015 grain per dry standard cubic foot (gr/dscf) of particulate matter as PM10, and see b)(2)e.
f.	OAC rules 3745-31-21 thru 27	See b)(2)d. and h.
g.	40 CFR Part 63 Subpart A	See b)(2)g
h.	40 CFR Part 63 Subpart IIII	See b)(2)h.
indirect fired 5 mmBtu natural gas fired infrared oven		
i.	OAC rule 3745-31-05(A)(3)	1.9 tons of carbon monoxide (CO) per year, 1.9 tons of nitrogen oxides (NOx) per year, 0.0019 pound PE per mmBtu, 0.05 ton per year of PE, 0.17 ton PM10 per year, 0.02 ton of sulfur dioxide (SO2) year, 0.12 ton of volatile organic compounds (VOC) per year, and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		5% opacity as a 6 minute average, and see b)(2) i..
j.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
k.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
l.	OAC rule 3745-18-06(A)	See b)(2) j..
m.	OAC rule 3745-21-07(B)	See b)(2) k.
n.	OAC rule 3745-21-08(B)	See b)(2) l
o.	OAC rule 3745-31-05(D)	0.083 pound CO per mmBtu, 0.0006 pound SO2 per mmBtu, and see b)(2)m.
p.	OAC rule 3745-31-10 thru 20	0.0075 pound PM10 per mmBtu, see b)(2)e.
q.	OAC rule 3745-31-21 thru 27	0.085 pound NOx per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)o., n, and r.
r.	40 CFR Part 63 Subpart A	See b)(2)f.
s.	40 CFR Part 63.52(a)(2)	See b)(2)o.
	sanding station(s)	
t.	OAC rule 3745-31-05(A)(3)	2.4 tons of PE per year, 5% opacity as a 6 minute average, and see b)(2)b. and p.
u.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
v.	OAC rule 3745-17-11(B)(1)	0.551 pound PE per hour.
w.	OAC rule 3745-31-10 thru 20	0.0015 gr/dscf of PM10, and see b)(2)q.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d), OAC rules 3745-31-10 thru 27, and 40 CFR Part 63 Subparts A and IIII.
- b. No visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. 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. 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.
- e. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, P306, K404 and K405 shall not exceed the following:
 - i. 1.09 tons of PE per rolling, 12-month period
 - ii. 3.65 tons of PM10 per rolling, 12-month period



- f. The combined emission from the sanding and coating in all repair operations (K404 thru K405) shall not exceed 1.85 tons of PM10 per rolling, 12-month period.
- g. 40 CFR Part 63, Subpart A, as it appears in Part II, Section 1. of PTI 04-1359, issued 9/2/2004, provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 63.
- h. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII as it appears in Part II, Section 2. of PTI 04-01359, issued 9/2/2004.
- i. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rules 3745-31-10 thru 27 and 40 CFR Part 63 Subpart DDDDD.
- j. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).
- k. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- l. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all applicable rules.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.



- m. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, P306, K404 and K405 shall not exceed the following:
 - i. 36.40 tons of CO per rolling, 12-month period, and
 - ii. 9.19 tons of SO₂ per rolling, 12-month period.
- n. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, P306, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period, and
 - ii. 2.36 ton of VOC per rolling, 12-month period.
- o. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by the Ohio EPA or U.S. EPA.

- p. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1) and OAC rules 3745-31-10 thru 20.
- q. The dry filtration system shall provide a control efficiency of no less than 98% by weight.
- r. The annual VOC emissions limitations represent the maximum potential to emit of this emissions unit a production limitation of 200,064 jobs per rolling 12-month period as made federally enforceable in K303 of this permit.

c) Operational Restrictions

- (1) All of the operations comprising this emissions unit shall be fully enclosed and all emissions shall be exhausted through a dry filtration system.
- (2) The permittee shall operate the dry filtration system whenever the respective emission source is in operation.

The total installed exhaust filtration rate from the sanding and coating repair operations located at the paint shop facility (K404 and K405) shall not exceed 11,000 scfm.

- (3) The permittee shall burn only natural gas in this emissions unit.
- (4) The maximum annual fuel usage for all emissions units located at the paint shop facility shall not exceed 845 mmscf of natural gas, based upon a rolling, 12 month summation of the natural gas usage figures.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee may elect to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit. This election shall be made by advance written notification to the Director (Toledo Division of Environmental Services) and shall remain in effect on a calendar month basis.
- (2) When compliance is being demonstrated through the use of compliance coatings, the permittee shall collect and record the following information each month for all coating repair operations located at the paint shop facility K404 and K405):
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
- (3) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall collect and record the following information each day for this emissions unit K404 and K405):
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings utilized in this emissions unit. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, 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.

- (4) The permittee shall maintain monthly records of the rolling 12-month total quantity of all coatings, in gallons, employed in all repair operations located at the paint shop facility (K404 and K405). These quantities shall be calculated as a summation of the coating usages recorded in each permit.
- (5) The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when this emissions unit was in operation.
- (6) The permittee shall perform daily checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from all stacks serving this emissions unit. The presence or absence of any visible emissions shall be



noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

If the daily checks show no visible emissions for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check by the permittee or an Ohio EPA inspector indicates visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of no visible emissions.

- (7) The permittee shall perform weekly checks, when this emissions unit is in operation, for any visible fugitive emissions from the enclosure serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

- (8) 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.



- (9) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of natural gas (in cubic feet) burned in all emissions units located at the paint shop facility. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee.
 - (10) The permittee shall maintain monthly records of the total quantity of natural gas (in cubic feet per month) burned in all emissions units located at the paint shop facility
 - (11) The permittee shall maintain monthly records of the total quantity of natural gas (in cubic feet per month) burned in all small natural gas combustion sources located at the paint shop facility
 - (12) The permittee shall maintain monthly records of the total the total CO, NOx, PM10, SO2 and VOC emissions from all small natural gas combustion sources) These emissions shall be calculated by multiplying the emissions limitations (in pounds per mmBtu) established for all small natural gas combustion sources in b)(1)of this permit by the total quantity of natural gas (in cubic feet per month) burned in all small natural gas combustion sources located at this facility
 - (13) The permittee shall maintain monthly records of the rolling 12-month total quantity of natural gas (in cubic feet per rolling, 12-month period) burned in all small natural gas combustion sources. These quantities shall be calculated as a summation of the total quantity of natural gas burned in all small natural gas combustion sources as recorded in paragraph (11) above.
 - (14) The permittee shall maintain monthly records of the total CO, NOx, PM10, SO2 and VOC emissions from all small natural gas combustion sources, in tons as a rolling, 12-month summation. These emissions shall be calculated as a summation of the total emissions from all small natural gas combustion sources as recorded in paragraph (12) above.
 - (15) The permittee shall maintain monthly records of the rolling 12-month total quantity of natural gas (in cubic feet per rolling, 12-month period) and fuel oil (in gallons per rolling, 12-month period) burned in all emissions units located at the paint shop facility.
 - (16) The permittee shall maintain monthly records of the total CO, NOx, PM10, SO2 and VOC emissions from the combustion of natural gas and fuel oil in all emissions units located at the paint shop facility, in tons as a rolling, 12-month summation. These emissions shall be calculated as a summation of the emissions from all combustion processes as recorded d)of each permit.
- e) Reporting Requirements
- (1) The permittee shall submit advance written notification of the election to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit. This notification shall be sent to the Director, Ohio EPA c/o the Toledo Division of Environmental Services.
 - (2) When compliance is being demonstrated through the use of compliance coatings, the permittee shall notify the Director (the Toledo Division of Environmental Services) in



writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days following the end of the calendar month.

- (3) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 45 days after the exceedance occurs.
- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the emissions unit exceeds the applicable coating usage limitation for all coatings employed in all repair operations located at the paint shop facility (K404 and K405).
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify each day when the dry filtration system was not in service when the respective emissions source was in operation.
- (6) The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) any corrective actions taken to eliminate the visible particulate emissions.
- (7) The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible fugitive emissions were observed from any enclosure serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- (8) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
- (9) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month of the calendar quarter during which the quantity of natural gas burned in all emissions units located at the paint shop facility exceeded the operational restrictions specified inc), and the actual cumulative quantity of fuel burned for each such month.
- (10) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month of the calendar quarter during which the quantity of CO, NOx, PM10, SO2 and/or VOC emissions from the combustion of natural gas and fuel oil in all emissions units located at the paint shop facility exceeded the emissions limitations specified inb)(1), and the actual cumulative quantity of CO, NOx, PM10, SO2 and VOC for each such month.
- (11) These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year.



f) Testing Requirements

- (1) Compliance with the emission limitation(s) for the repair booth filter exhaust stack shall be determined in accordance with the following method(s):

Compliance with the emission limitation(s) for this emissions unit shall be determined in accordance with the following method(s):

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

Applicable Compliance Method:

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

- b. no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emission Limitation:

0.551 pound of PE per hour

Applicable Compliance Method:

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

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

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/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

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru



5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

2.4 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.551 pound of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 7000 gr/lb and 2000 lbs/ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation.

e. 0.0015 gr/dscf PM10 per hour

Applicable Compliance Method:

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

f. Emission Limitation:

0.62 tons of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.0015 gr/scf), by the total installed exhaust rate from the sanding operations (11,000 cfm), by 60 minutes per hour, and by the maximum annual hours of operation (8760 hrs), and then dividing by 7000 gr/lb and 2000 lbs/ton. Therefore, if compliance is shown with the limitation for exhaust concentration, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

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

Applicable Compliance Method:

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

Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the



USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

h. Emission Limitation:

14.5 tons of VOC per year

Applicable Compliance Method:

If required, compliance shall be demonstrated by multiplying the VOC emission limitation (4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents), by the total annual quantity of all coatings, in gallons, employed in this emissions unit calculated as a summation of the coating usages recorded in d)of this permit and then dividing by 2000 lbs/ton.

(2) Compliance with the emission limitation(s) for the combustion gas exhaust stack shall be determined in accordance with the following method(s):

a. Emission Limitation:

5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A.

c. 1.9 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hr) by the allowable emission limitation (0.083 pound of CO per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then



dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation

d. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A.

e. 1.9 tons of NO_x per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hr) by the allowable emission limitation (0.085 pound of NO_x per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9).

g. 0.05 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hr) by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then



dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

0.0075 pound of PM10 per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M.

i. Emission Limitation:

0.17 ton of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hr) by the allowable emission limitation (0.0075 pound of PM10 per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

0.0006 pound of SO2 per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

k. Emission Limitation:

0.02 ton of SO2 per year



Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hr) by the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

I. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10.

m. Emission Limitation:

0.12 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hr) by the allowable emission limitation (0.0054 pound of VOC per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

(3) Compliance with the combined emission limitation(s) for this emissions unit shall be determined in accordance with the following method(s):

a. Emission Limitation:

No visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



b. Emission Limitation:

The combined emissions from sanding and coating in all repair operations located at this facility shall not exceed 0.62 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum rate of filtered exhaust (11,000 scfm) times the allowable emission limitation (0.0015 gr/dscf of PM10) by 60 minutes per hour, and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton and 7000 grains per pound. Therefore, if compliance is shown with the allowable emission limitation, and total installed exhaust filtration rate is no more than 11,000 cfm, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

The combined emission from the coating operations in all repair operations located at this facility shall not exceed 14.5 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the VOC emission limitation (4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents), by the maximum rolling, 12-month quantity of coatings employed in all repair operations located at this facility (6,000 gallons excluding water and exempt solvents) and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the allowable emission limitation, and with the maximum quantity of coatings employed, compliance shall also be shown with the annual emission limitation.

d. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, P306, K404 and K405 shall not exceed the following:

- i. 1.09 tons of PE per rolling, 12-month period
- ii. 3.65 tons of PM10 per rolling, 12-month period
- iii. 36.40 tons of CO per rolling, 12-month period
- iv. 9.19 tons of SO2 per rolling, 12-month period
- v. 2.36 tons of VOC per rolling, 12-month period
- vi. 37.89 tons of NOx per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in d)and the emissions factors demonstrated in



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104249

Facility ID: 0448011731

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f)of the permit for each emission unit located at the paint shop facility which combusts no. 2 fuel oil or natural gas.

g) Miscellaneous Requirements

(1) None.