



State of Ohio Environmental Protection Agency

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8/6/2009

Gerald King
General Motors Lordstown Complex
2300 Hallock-Young Rd.
Warren, OH 44481

Certified Mail
Facility ID: 0278000199
Permit Number: P0085987
County: Trumbull

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

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Warren Tribune Chronicle. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit 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 permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 W. Town St., 7th Floor
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

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

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

PUBLIC NOTICE
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit
General Motors Lordstown Complex

Issue Date: 8/6/2009

Permit Number: P0085987

Permit Type: Renewal

Permit Description: TV Renewal

Facility ID: 0278000199

Facility Location: General Motors Lordstown Complex

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

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 Title V operating permit for the facility at the location identified above on the date indicated. 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 Robert Goulish at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.state.oh.us/dapc

Statement of Basis For Title V Permit

Part I - General	
Company Name	General Motors Lordstown Complex
Premise Number	02-78-00-0199
What makes this facility a Title V facility?	VOC emissions
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	yes
Were there any common control issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	no
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a	PTI No. 02-17027 was issued in 2005 for an entire new paint shop. Emissions units K002, Topcoat and primer surface, K008, K018, K019, K020, K021, K022, all final repair booths, L002, solvent pre-wipe,

		(3745-)														
G002	Stage I vapor control	21-09(G)		N	Y	Y	N	N	Y	N	Y	N	N	N		Stage I rule based operational requirements
K017	1.33 lbVO C/gal solids applied		40CFR Part 60, Subpart MM	N	Y	Y	N	N	Y	N	Y	N	Y	N		OR - temp. restriction for thermal incinerator 3745-21-02(B)(3), capture and destruction eff. , and restricted operating hour contained in permit to install for synthetic minor
K017	0.6 lb VOC/gal ctg	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR - temp. restriction for thermal incinerator 3745-21-02(B)(3), capture and destruction eff. , and restricted operating hour contained in permit to install for synthetic minor
K017	301 lb VOC/day	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR - temp. restriction for thermal incinerator 3745-21-02(B)(3), capture and destruction eff. , and restricted operating hour contained in permit to install for synthetic minor
K025	6.07 lbs VOC/gal solids applied	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. Minor PTI
K025	7174 lbs VOC/day	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. Minor PTI
K025	326 lbs VOC/hr	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. Minor PTI
K025	941 tpy VOC	31-05(C)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. Minor PTI
K025	PE:9.5 lbs/hr	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR – overspray filtration system required
K025	VE = 20%	17-07(A)		N	Y	Y	N	N	Y	N	Y	N	Y	N		OR – overspray filtration system required

K025	NOx: 3.1 lbs/hr	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K025	CO: 1.9 lbs/hr	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K025	Incinerator DE=9 5%	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. Minor PTI
K025	Concentrator RE=9 0%	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – temp. restriction on incinerator, VOC concentrator requirement, production restriction for syn. Minor PTI
K026	0.13 lbs VOC/gal solids applied	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K026	73.7 lbs VOC/hr	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K026	9.7 tpy VOC	31-05(C)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K027	160 lbs VOC/day	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K027	8.35 lbs VOC/hr	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K027	24 tpy VOC	31-05(C)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K027	PE:0.551 lbs/hr	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – overspray filtration system required
K027	VE = 20%	17-07(A)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – overspray filtration system required
K028	936 lbs VOC/day	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	
	49.5 lbs	31-05(A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	

K028	VOC/ hr														
K028	143 tpy VOC	31-05(C)		N	N	Y	N	N	Y	N	Y	N	Y	N	
K033	266.7 tpy VOC	31-05(C)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – use of photochemically reactive material prohibited
P025	PE: 7.3 TPY	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – requires use of natural gas only
P025	OC: 5.3 TPY	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – requires use of natural gas only
P025	SO2: 0.6 TPY	31-05(A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – requires use of natural gas only
P025	NOx: 133.7 TPY	31-05(C)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – requires use of natural gas only
P025	CO: 80.2 TPY	31-05(C)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – requires use of natural gas only
R516	3.5 lbs VOC/ gal	21- 09(U)(1)(d)		N	N	Y	N	N	Y	N	Y	N	Y	N	

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

X **Instructions for Part III:**

- X All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- X If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an AN@ in the column under ASIP.@ If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a AY@ should be noted in the AOther@ column, and if not, an AN@ should be noted. If the basis for the term and condition is AOther,@ an explanation of the basis must be provided in the AComments@ section. If OAC rule 3745-31-05 is cited in the AOther@ column, please indicate in the AComments@ section whether or not all of the requirements have been transferred from the permit to install.
- § To complete the remainder of the table after ABasis,@ except for the AComments@ section, simply specify a AY@ for yes or an AN@ for no. For the AM,@ AR,@ ARp,@ and AET@ columns, if AN@ is specified, there should be a brief explanation in the AComments@ section as to why there are no requirements. If a brief explanation is provided in the AComments@ section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the AComments@ section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the AMonitoring,@ ARecord Keeping,@ or AReporting@ requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the AMonitoring,@ ARecord Keeping,@ or AReporting@ requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the AComments@ section would be sufficient.

Also, if a AY@ is noted under AOR,@ AMisc,@ ASt,@ AND,@ or AENF@ an explanation of the requirements must be provided in the AComments@ section. In addition to a general explanation of the AOR,@ AMisc,@ ASt,@ AND,@ and/or AENF@ the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
 2. If a control plan and schedule is included in the AMiscellaneous Requirements@ section of the permit, provide an explanation in the AComments@ section of the violation, basis for the violation, and the company=s proposed control plan and schedule.
 3. If the AND@ column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
- A. If the AENF@ column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an AN@ is noted in the AOR,@ AMisc,@ ASt,@ AND,@ or AENF@ columns.

- X Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the `AN/A@` in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the `AComments@` area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain `AN/A@` when developing the SOB during the initial permit development. Note: APA=s and Off-permit changes do not need to be noted in the SOB.



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

DRAFT

**Air Pollution Title V Permit
for
General Motors Lordstown Complex**

Facility ID: 0278000199

Permit Number: P0085987

Permit Type: Renewal

Issued: 8/6/2009

Effective: To be entered upon final issuance

Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Title V Permit
 for
 General Motors Lordstown Complex

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

Draft Title V Permit

Permit Number: P0085987

Facility ID: 0278000199

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0278000199

Facility Description: Automobile Stamping, Assembly and Finishing

Application Number(s): A0016683, A0016684

Permit Number: P0085987

Permit Description: TV Renewal

Permit Type: Renewal

Issue Date: 8/6/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

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

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

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 Title V Permit

Permit Number: P0085987

Facility ID: 0278000199

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c) The permittee shall submit required reports in the following manner:
 - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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



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

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

See A.29 below if no deviations occurred during the quarter.
(*Authority for term: OAC rule 3745-77-07(A)(3)(c)*)

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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



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

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

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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



6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) 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 reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or



(3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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



statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.



d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

- (a) An identification of each term or condition of this permit that is the basis of the certification.
- (b) The permittee's current compliance status.
- (c) Whether compliance was continuous or intermittent.
- (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
- (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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



to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the



permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

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

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

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

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



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(Authority for term: OAC rule 3745-77-01(H)(11))

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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



EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0085987

Facility ID: 0278000199

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) B.4
2. The permittee shall comply with the requirements contained within the most recent version of the following regulations that are applicable to the facility:
 - a) 40 CFR Part 63, Subpart IIII – National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
3. The following insignificant emissions units are located at this facility:
 - L003 - Solvent Cleaning Deck;
 - P016 - Mobile equipment battery charging areas;
 - P017 - Carpenter shop with dust collector;
 - P019 - Phosphate Pre-Treat;
 - R016 - Central Maintenance Paint Booth;
 - R505 - Maintenance paint booth;
 - T001 - Scrap Solvents Tank;
 - T002 - Waste Purge Thinner Tank;
 - T003 - Automatic Transmission Fluid Tank;
 - T004 - Automatic Transmission Fluid Tank;
 - T005 - Acrylic Cleaning Thinner Tank;
 - T006 - Power Steering Fluid Tank;
 - T007 - Transmission Oil Tank;
 - T008 - Engine Oil Tank;
 - T009 - Reclaim Purge Thinner Tank;
 - T010 - Windshield Washer Solvent Tank;
 - T011 - Purge Cleaning Thinner Tank;
 - T012 - Purge Cleaning Thinner Tank;
 - T013 - Polystrip Tank;



- T017 - Anti-freeze Tank;
- T018 - Anti-freeze Tank;
- T021 - Fuel Oil Tank;
- T028 - DF-2 Fuel Storage Tank;
- Z003 - Vehicle Roll test;
- Z010 - Laboratory equipment and laboratory fume hoods;
- Z013 - Solvent cold cleaners;
- Z014 - Grinding, machining, and abrasive pneumatic conveying;
- Z015 - Maintenance welding;
- Z016 - Arc welding;
- Z017 - Resistance spot welding;
- Z021 - Bulk storage material transferring equipment;
- Z022 - Emergency diesel generators;
- Z023 - High pressure water cleaning equipment;
- Z024 - Vehicle fluid fill operations;
- Z025 - Misc. aerosol spray cans;
- Z026 - Mechanical repair stalls;
- Z028 - Engine subassembly lines;
- Z029 - Radiator subassembly lines;
- Z030 - Trim assembly line;
- Z031 - Gasoline tank assembly area;
- Z032 - Material storage;
- Z033 - Paint pump repair shop;
- Z034 - Wet/dry sanding booths;
- Z035 - Leak test areas;
- Z036 - Parts washers and rinse tanks using detergent cleaners;
- Z037 - Storage tanks for inorganic liquids including water;



- Z038 - Pressurized storage tanks for propane, butane and LPG;
- Z039 - Storage tanks for liquids (capacity < 700 gallons);
- Z040 - Cleanup activities-onsite removal or removal action (VOCs);
- Z042 - Gasoline dispensing facilities (fleet);
- Z043 - Body Shop Washer;
- Z044 - Spot sanding and painting;
- Z045 - EDP sanding booth;
- Z046 - Guidecoat and minor topcoat sanding booth;
- Z047 - Final Repair sanding;
- Z049 - Open Burning (fire training);
- Z502 - Maintenance Parts Washers (with covers);
- Z503 - Heat Treat Furnace;
- Z504 - EDM metal machining using a cutting fluid (with filter system);
- Z505 - Rooftop Space Heater 1;
- Z506 - Rooftop Space Heater 2;
- Z507 - Rooftop Space Heater 3;
- Z508 - Rooftop Space Heater 4;
- Z509 - Rooftop Space Heater 5;
- Z510 - Rooftop Space Heater 6;
- Z511 - Rooftop Space Heater 7;
- Z512 - Rooftop Space Heater 8;
- Z513 - Rooftop Space Heater 9;
- Z514 - IC Engine 1 - Baler House; and
- Z515 - IC Engine 2 – Security.

Each insignificant emissions unit at this facility must comply with all State and Federal regulations, as well as any emission limitations and/or control requirements contained with the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.



4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "DeMinimis" criteria established in OAC rule 3745-15-05:

G501 - Gasoline dispensing to on-site vehicles;

P507 - Cutter grind machinery including drills, grinders, etc. (with bag collectors);

P509 - Pattern shop grinding, drilling of wood and plastic (with cyclone collector);

P510 - Wheelabrator dry blasting equipment (with bag collector);

T529 - Storage tank (T-201);

T530 - Storage tank (T-202);

T531 - Storage tank (T-203);

T532 - Storage tank (T-204);

T533 - Storage tank (T-205);

Z002 - Vehicle Start-up; and

Z516 - Miscellaneous maintenance solvent cleaning of parts.

5. Ohio BAT Operational Restrictions

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

(Authority for term: OAC rule 3745-31-05(A)(3) (PTI No. 02-17027) and OAC rule 3745-77-07(A)(1))

6. Ohio BAT Monitoring and/or Record Keeping Requirements

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

(1) the monthly jobs produced off of the final assembly; and

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

(Authority for term: OAC rule 3745-31-05(A)(3) (PTI No. 02-17027) and OAC rule 3745-77-07(A)(1))

7. Ohio BAT Reporting Requirements

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

(Authority for term: OAC rule 3745-31-05(A)(3) (PTI No. 02-17027) and OAC rule 3745-77-07(A)(1))



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0085987

Facility ID: 0278000199

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



- 1. G002, Gasoline Operation (Tank #15&16-Gasoline/Gasoline fill)

Operations, Property and/or Equipment Description:

Gasoline Operation (Tank #15 & 16 Gasoline/Gasfill)

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

- (1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

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

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

- (2) Additional Terms and Conditions

- a. None.

- c) Operational Restrictions

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

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

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

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

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

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

- f. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of



paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

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

d) Monitoring and/or Recordkeeping Requirements

(1) OAC rule 3745-21-09(R) does not establish or require a regular leak-checking program. However, for any leak checks performed, the permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

- a. date of inspection;
- b. findings (may indicate no leaks discovered or location, nature, and severity of each leak);
- c. leak determination method;
- d. corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days); and
- e. inspector's name and signature.

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

e) Reporting Requirements

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

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

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.



2. K017, Cathodic EDP Prime Coating System

Operations, Property and/or Equipment Description:

Cathodic EDP Primer Coating System

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) (PTI 02-7344)	See b)(2)b, b)(2)c, c)(1), c)(2), and c)(3). The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM.
c.	OAC rule 3745-21-09(C)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall not cause to be discharged into the atmosphere from this emissions unit, volatile organic compounds (VOC) emissions in excess of 0.16 kilogram of VOC per liter of applied solids, or 1.33 pounds of VOC per gallon of applied solids, on a monthly volume-weighted average basis.

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

c. The maximum daily emission rate for this emissions unit shall not exceed 301 pounds of VOC. In addition, the total VOC emissions from this emissions unit, including cleanup materials, shall not exceed 45.2 tons per year.

d. The requirements of OAC rule 3745-21-09(C) are less stringent than the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-31-05.



c) Operational Restrictions

- (1) The permittee shall limit the production operation of the Elpo Dip System to 6000 hours per year.

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

- (2) The permittee shall employ a VOC capture system that captures emissions from the Elpo Dip System. The total capture efficiency for this system shall be at least 70%, by weight, for all coatings and solvents employed.

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

- (3) The permittee shall operate a VOC oxidizer system at all times the Elpo Dip System is in operation. The VOC oxidizers shall either have a destruction efficiency of no less than 90% of non-methane volatile organic compounds or shall meet an outlet concentration of 25 ppm, whichever is less stringent.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(6), and OAC rule 3745-77-07(A)(1))

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each oxidizer's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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



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



during the most recent performance test that demonstrated the emissions unit was in compliance.

- I. If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitations specified in b)(2)a, b)(2)b, and/or b)(2)c, all 3-hour blocks of time during which the average temperature difference across the catalyst beds was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance. (Authority for term: OAC rule 3745-31-05(A)(3), OAC rules 3745-21-09(B)(3)(I)(iii), and OAC rule 3745-77-07(C)(1))

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

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

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

- (4) The permittee shall collect and record the following information for each month for this emissions unit:

- a. The name and identification number of each coating material added to the dip tank.
- b. The VOC content, in pounds of VOC per gallon, of each material added to the dip tank.
- c. The volume, in gallons and the solids content, in gallon of solids per gallon, of each material employed.
- d. The monthly volume-weighted average VOC content of the materials added to the dip tank, in pounds VOC per gallon of solids applied.
- e. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids. If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitation specified in b)(2)a, the controlled VOC emission rate shall be calculated using (i) the monthly volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance. If the emission reductions achieved by the catalytic oxidizer are not used by the permittee to demonstrate compliance with the limitation specified in b)(2)a, the controlled VOC emission rate shall be equal to the value recorded in d)(2)d.

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

- (5) The permittee shall perform a preventative maintenance inspection of the catalytic oxidizers on an annual basis to evaluate the performance of the catalyst bed. The inspection shall consist of internal and visual inspections and shall, at a minimum, include a physical inspection of the units and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and



recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations or best practices as determined by the permittee if the manufacturer is silent on appropriate inspection procedures. Repair and replacement of equipment shall be performed as necessitated by the inspection. A sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in term f)(4).

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

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation.

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

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

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

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

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

- (4) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst beds did not comply with the temperature limitation specified above.

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

- (5) If the emission reductions achieved by the catalytic oxidizer are used by the permittee to demonstrate compliance with the limitations specified in b)(2)a, b)(2)b, and/or b)(2)c, the permittee shall submit quarterly temperature reports that identify all 3-hour blocks of time during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference across the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

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



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

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

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

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

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

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

f) Testing Requirements

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

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

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.



- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s).

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

- (2) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC emissions shall not exceed 301 pounds per day.

Applicable Compliance Method:

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

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

- b. Emission Limitation:

VOC emissions shall not exceed 0.6 pound of VOC per gallon of coating, excluding water and exempt solvents, on a monthly volume-weighted average, and 1.33 pounds of VOC per gallon of applied solids or 0.16 kilogram of VOC per liter of applied solids on a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2) and d)(4), respectively.



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

c. Emission Limitation:

VOC emissions shall not exceed 45.2 tons per year.

Applicable Compliance Method:

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

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

- (3) USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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

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

- (4) The permittee shall conduct, or have conducted, annual catalyst activity testing using the catalyst sample collected during the annual preventive maintenance inspection described in d)(5). An intent to test notification shall not be required for the testing noted in this term.

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

g) Miscellaneous Requirements

- (1) None.



3. K025, Top Coat Process

Operations, Property and/or Equipment Description:

Top coat process, basecoat and clearcoat

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	<p>Overall Top Coat Process: 6.07 lbs of volatile organic compounds (VOC) per gallon of solids applied.</p> <p>VOC emissions shall not exceed 7174.2 lbs of VOC per day based on a daily average for each calendar month.</p> <p>VOC emissions shall not exceed 326.1 lbs per hour.</p> <p>See b)(2)f.</p> <p>Particulate emissions (PE) shall not exceed 9.5 lbs per hour.</p> <p>The emissions from the main thermal oxidizer exhaust stack shall not exceed the following:</p> <p>Nitrogen oxides emissions (NO_x) shall not exceed 3.1 pounds per hour.</p> <p>See b)(2)g.</p> <p>Carbon monoxide emissions (CO) shall not exceed 1.9 pounds per hour.</p> <p>See b)(2)g.</p> <p>See b)(2)a, b)(2)b, b)(2)c, and b)(2)d.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-31-05(D), and OAC rule 3745-31-28.
b.	OAC rule 3745-31-05(D)	Annual Topcoat emissions shall not exceed: 941.0 tons of VOC per rolling, 12-month summation. PE emissions shall not exceed 27.4 tons per rolling, 12-month summation.
c.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-21-09(C)(1)(c)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 60, Subpart MM	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-31-28	See b)(2)e.

(2) Additional Terms and Conditions

- a. The Top Coat Process consists of a waterborne basecoat area with a heated flash off and a solvent borne clearcoat area followed by a curing oven. The heated flash and curing ovens shall be controlled by a thermal oxidizer. The clearcoat booth shall be partially controlled by a VOC concentrator. The desorption of the concentrator uses the same thermal oxidizer as the heated flash and ovens.
- b. The thermal oxidizer, associated with the basecoat flash off oven, the clearcoat VOC concentrator, and the top coat curing oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight.



- c. The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight.
- d. The overall VOC capture efficiency for the clearcoat booth(s) operation shall be equal to or greater than 85 percent, by weight.
- e. In accordance with 40 CFR, Part 63, Subpart B, sections 63.40 through 63.44 and the Clean Air Act Section 112(g), the permittee shall not cause to be discharged into the atmosphere more than 0.5 lb of Hazardous Air Pollutant (HAP) per gallons of coating solids applied on a monthly average basis, from the combination of the Top Coat Process (K025) and the Primer Surfacer System (K026).
- f. The hourly limitation is based on the emissions unit's potential to emit after applying the capture and control efficiencies specified above. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this limitation.
- g. The hourly limitation is based on the emissions unit's potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this limitation. The annual NO_x and CO emissions for this emissions unit are accounted for in the terms for P025.

c) Operational Restrictions

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

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rules 3745-21-09(B)(3)(l)(ii), and OAC 3745-77-07(A)(1))

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

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

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

- a. an initial stationary layer of carbon;
- b. a rotating absorbent carbon wheel;
- c. an operating desorption fan; and
- d. a standard desorption temperature range between 200 and 260 degrees Fahrenheit (this specific range was established during the initial performance testing and may be re-established during subsequent compliance testing).

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



d) Monitoring and/or Recordkeeping Requirements

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

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

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

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(I), 40 CFR Part 63, Subpart IIII, and OAC rule 3745-77-07(C)(1))

- (3) Pursuant to OAC rule 3745-21-09(C)(4), the permittee shall maintain records for the top coat process that will enable the permittee to calculate the VOC emission rate in order to demonstrate compliance with the emission limitation identified in b)(1) above for the topcoat process in accordance with the U.S. EPA's " Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, Dec.1988) and any subsequent revisions thereof. The permittee shall calculate the VOC emission rates for the topcoat operation in pounds of VOC per gallon of solids applied and in pounds of VOC per day, using the overall capture and control efficiency for the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

- (4) Pursuant to OAC rule 3745-21-09(C)(4), the permittee shall maintain records for the top coat process and primer surfacer system that will enable the permittee to calculate the HAPs emission rate in order to demonstrate compliance with the emission limitation identified in b)(2)e above for the topcoat process and primer surfacer system in accordance with the U.S. EPA's " Protocol for Determining the Daily Volatile Organic



Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, Dec.1988) and any subsequent revisions thereof. The permittee shall calculate the HAP emission rates for the topcoat operation and primer surfacer system in pounds of HAPs per gallon of solids applied, using the overall capture and control efficiency for the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

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

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

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

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

- (7) The permittee shall collect, record and calculate the following information each month for the Top Coat Process (K025) and the Primer Surfacer System (K026):
- a. the name and identification number of each coating, as applied;
 - b. the HAP content for each coating in pounds of HAPs per gallon of coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the volume of solids of each coating employed, in percent;
 - e. the volume of solids applied of each coating, in gallons (using the most recently determined transfer efficiencies); and
 - f. the combined HAP emissions limitation from all coatings employed, in pounds of HAP per gallons of solids applied (GSA).

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

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

- (8) The permittee shall operate and maintain the following sensors, monitors and recorders associated with the VOC concentrator when the emissions unit is in operation:
- a. A motion sensor that will detect rotation of the adsorbent carbon wheel in the VOC concentrator. The sensor shall be connected to a system alarm that will notify the appropriate personnel that motion is not detected.



- b. An operation sensor that will detect operation of the desorption fan, which controls air flow through the adsorbent carbon wheel. The sensor shall be connected to a system alarm that will notify the appropriate personnel when the fan is not in operation.
- c. The desorption air inlet temperature shall be monitored and recorded to assure temperature is sufficient to cause desorption. Standard desorption temperature range is between 200 and 260 degrees Fahrenheit. A specific range may be established during the initial performance test specified in f)(2)a, or re-established during subsequent compliance testing.

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

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

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

e) Reporting Requirements

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

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

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

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

- (3) By February 15 of each year, and in accordance with section 18 of the U.S.EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) and any subsequent revisions thereof, the permittee shall submit to the Ohio EPA Northeast District Office a report which reviews the current operating conditions for this emissions unit and compares them to the conditions in existence at the time of the most recent transfer efficiency tests.

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



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

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

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

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

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

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

- a. an identification of all months during which the HAP emission limitation for K025 and K026 was exceeded (pound HAP per gallon of solids applied).

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

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

- (7) The permittee shall submit deviation (excursion) reports that identify all situations during which the VOC concentrator adsorbent carbon wheel motion sensor and/or the desorption fan operation sensor alarms were activated, when the emissions unit was in operation.

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

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

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(I), 40 CFR Part 63, Subpart IIII and OAC rule 3745-77-07(A)(1))

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

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



f) Testing Requirements

(1) Compliance with the emission limitations and operational restriction in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

VOC emissions shall not exceed 326.1 lbs per hour.

Applicable Compliance Method:

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

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

c. Emission Limitation:

VOC emissions shall not exceed 7174.2 lbs per day, on a monthly average basis.

Applicable Compliance Method:

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

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

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



e. Emission Limitation:

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

Applicable Compliance Method:

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

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

where:

PE = particulate emission rate (lb/hr);

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

CE = control efficiency of the control equipment.

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

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

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

f. Emission Limitation:

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

Applicable Compliance Method:

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

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

g. Emission Limitation:

HAP emissions shall not exceed 0.5 lb of HAP per gallon of solids applied.

Applicable Compliance Method:

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

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



h. Emission Limitation:

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

Applicable Compliance Method:

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

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

i. Emission Limitation:

Production shall not exceed 502,755 jobs produced off the final line, as a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based on the record keeping requirements in B.6 of this permit.

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

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

- a. The emission testing shall be conducted approximately 2 years after issuance and within one year prior to permit expiration, or at approximately 2.5 year intervals starting with the date of the last test that showed compliance.
- b. The emission testing shall be conducted to demonstrate compliance with the hourly allowable mass emission rate for the VOC emission rates from the thermal oxidized stack. Compliance with the CO and NOx emission rates were demonstrated during the initial performance test (Feb. 2006).
- c. The emission testing shall be conducted to demonstrate compliance by measuring the control efficiencies for VOC for the thermal oxidizer and the concentrator operated in association with this emissions unit.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- e. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC's, Method 24 or 24A, and Method 25 or 25A of 40 CFR Part 60, Appendix A, formulation data, or any approved alternative test method.
- f. If required, the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NOx, Method 7 or 7E of



40 CFR Part 60, Appendix A, or any approved alternative test method, and for CO, Method 10 of 40 CFR Part 60, Appendix A or any approved alternative test method.

- g. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- h. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- i. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s).

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

- (3) USEPA Method 24 shall be used to determine the analytical VOC contents of the coatings employed. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. The permittee shall also use the formulation VOC as required by the U.S.EPA's "Protocol for Determining the Daily Volatile Organic Compound



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

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Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988) in b)(1).

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

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

g) Miscellaneous Requirements

- (1) None.



4. K026, Powder Primer Surfacer

Operations, Property and/or Equipment Description:

System powder coating - booth and oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-28	See b)(2)a.

(2) Additional Terms and Conditions

- a. In accordance with 40 CFR, Part 63, Subpart B, sections 63.40 through 63.44 and the Clean Air Act Section 112(g), the permittee shall not cause to be discharged into the atmosphere more than 0.5 lb of Hazardous Air Pollutant (HAP) per gallons of coating solids on a monthly average as applied basis, from the combination of the Top Coat Process (K025) and the Primer Surfacer System (K026).
- b. The hourly emission limitation is based on the emissions units' potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

None

d) Monitoring and/or Recordkeeping Requirements

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

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

- (2) The permittee shall collect, record and calculate the following information each month for the Top Coat Process (K025) and the Primer Surfacer System (K026) :



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

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

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

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

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

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

e) Reporting Requirements

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

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

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

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

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

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



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

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

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

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

f) Testing Requirements

- (1) Compliance with the emission limitations and operational restriction in b)(1), b)(2) and B.5 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

VOC emissions shall not exceed 73.7 lbs per day.

Applicable Compliance Method:

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

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

c. Emission Limitation:

VOC emissions shall not exceed 9.7 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method:

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



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

d. Emission Limitation:

Production shall not exceed 502,755 jobs produced off the final line, as a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based on the record keeping requirements in B.6 of this permit.

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

e. Emission Limitation:

HAP emissions shall not exceed 0.5 lb of HAP per gallon of solids applied.

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.



5. K027, Final Repair

Operations, Property and/or Equipment Description:

Application booths and drying devices

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	<p>Volatile organic compounds (VOC) emissions shall not exceed 160 lbs per day.</p> <p>VOC emissions shall not exceed 8.35 lbs per hour.</p> <p>See b)(2)b.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-11(B), OAC rule 3745-17-07(A) and OAC rule 3745-21-09(C)(1)(d).</p>
b.	OAC rule 3745-31-05(D)	<p>Annual Final repair emissions shall not exceed 1.9 tons PE per rolling, 12-month summation.</p> <p>VOC emissions shall not exceed 24 tons per rolling, 12-month summation.</p>
c.	OAC rule 3745-21-09(C)(1)(d)	See b)(2)a.
d.	OAC rule 3745-17-11(B)	PE emissions shall not exceed 0.551 lb per hour.
e.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.



(2) Additional Terms and Conditions

- a. The VOC content of all the coatings employed shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
- b. The VOC hourly emission limitation is based on the emissions units' potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect, record and calculate the following information for each day for this emissions unit:

- a. the name and identification number of each coating, as applied;
- b. the VOC content (excluding water and exempt solvents), the number of gallons of each coating, as applied, 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 or approved alternative;
- d. the name and identification of each cleanup material employed;
- e. the number of gallons of each cleanup material employed;
- f. the VOC content of each cleanup material, in pounds per gallon; and
- g. the total VOC emissions from all coatings and cleanup materials employed, in pounds.

The permittee shall record the required information for each day at the end of the calendar month.

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

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

- a. the total monthly emission rate, in tons, based on the daily values recorded in d)(1); and
- b. the rolling, 12-month summation of the monthly VOC emission rates, in tons.



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

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

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

e) Reporting Requirements

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

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

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing that the daily VOC limitation of 160 pounds of VOC/day was exceeded.

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

- (3) The permittee shall submit deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions exceeded 24 tons. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

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

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

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 4.8 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average

Applicable Compliance Method:

Compliance shall be based upon the record keeping in d)(1). USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or



operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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

b. Emission Limitation:

VOC emissions shall not exceed 160 pounds per day.

Applicable Compliance Method:

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

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

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

c. Emission Limitation:

VOC emissions shall not exceed 24 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method:

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

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

d. Emission Limitation:

PE emissions shall not exceed 0.551 lb/hr and 1.9 tons per year.

Applicable Compliance Method:

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

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

where:

PE = particulate emission rate (lb/hr);



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

CE = control efficiency of the control equipment.

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

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

e. Emission Limitation:

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

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

- (1) None.



6. K028, Facility Wide Sealers & Adhesives

Operations, Property and/or Equipment Description:

Sealers and adhesives

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	See b)(2)a. Volatile organic compounds (VOC) emissions shall not exceed 936 lbs per day based on a daily average for each calendar month. VOC emissions shall not exceed 49.5 lbs per hour. See b)(2)b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 143 tons per rolling, 12-month summation.
c.	OAC rule 3745-21-09(U)(1)(h)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

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



- b. The VOC hourly emission limitation is based on the emissions units' potential to emit. Therefore, no hourly record keeping and deviation reporting are required to demonstrate compliance with this emission limitation.
- c) Operational Restrictions
 - (1) None
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect, record and calculate the following information monthly for this emissions unit:
 - a. the name and identification number of each coating/adhesive/sealer, as applied;
 - b. the VOC content of each coating/adhesive/sealer, in pounds per gallon (or other appropriate units) excluding water and exempt solvents, the number of gallons (or other appropriate unit), of each coating/adhesive/sealer as applied, and the number of gallons (or other appropriate unit), excluding water and exempt solvents, of each coating/adhesive/sealer as applied;
 - c. the daily volume-weighted average VOC content of all coating/adhesive/sealer, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;
 - d. the number of days the emissions unit was in operation;
 - e. the monthly VOC emissions from all coating/adhesive/sealers employed, in pounds; and
 - f. the average daily VOC emission rate for all coating/adhesive/sealer employed, i.e., (e/d), in pounds/day (average).

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
 - (2) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

(Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
- e) Reporting Requirements
 - (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

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



- (2) The permittee shall submit deviation (excursion) reports that identify all times when the VOC emission rate from this emissions unit exceeds 936 pounds per day based on a daily average for each calendar month. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.

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

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

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation :

VOC emissions shall not exceed 0.3 lb VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average for all coating/adhesive/sealer employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitation above based on the record keeping requirements in d)(1) of this permit. USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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



c. Emission Limitation:

VOC emissions shall not exceed 143 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.



7. K033, Misc. Solvents

Operations, Property and/or Equipment Description:

Misc. Solvent Usage body wipe, paint line purge, cleanup, maintenance, etc. (Replaces emission unit Z009)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	OC emissions shall not exceed 266.7 tons/yr, based on a rolling, 12-month summation.
c.	OAC rule 3745-21-07(G)	See b)(2)a and c)(1).

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c, c)(1), d)(1)k, and e)(2).

c) Operational Restrictions

(1) The use of any photochemically reactive material for body wipe, cleaning, and/or any other miscellaneous use performed outside of any paint booths, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

(Authority for term: PTI 02-17027 and OAC rule 3745-77-07(A)(1))



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Title V Permit

Permit Number: P0085987

Facility ID: 0278000199

Effective Date: To be entered upon final issuance



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

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification for each solvent employed;
 - b. the number of gallons of each solvent material employed;
 - c. the OC content of each solvent material, in pounds per gallon;
 - d. the number of gallons of each solvent material employed in basecoat purging;
 - e. the number of gallons of each solvent material employed in clearcoat purging;
 - f. the number of gallons of solvent material recovered in the topcoat system;
 - g. the calculated, controlled OC emission rate from all solvent materials employed in the topcoat system, (using capture and destruction efficiencies from the most recent test required in K025), in pounds or tons;
 - h. the OC emissions from each solvent material employed (other than those used in purging), in pounds;
 - i. the total OC emissions from all the solvent materials employed [summation of h for all non-purging solvents/2000 + g], in tons;
 - j. the rolling, 12-month summation of the monthly OC emission rates, in tons; and
 - k. documentation on whether or not each material employed is a photochemically reactive material, as specified in c)(1).

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

e) **Reporting Requirements**

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

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

- (2) The permittee shall submit deviation (excursion) reports that include the identification of any photochemically reactive liquid organic material employed, as specified in c)(1), the day(s) such materials were employed, the amount of any such materials employed, and the total pounds of OC emitted. The reports shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days following the end of the calendar month.

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



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

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

f) Testing Requirements

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

- a. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

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

g) Miscellaneous Requirements

- (1) None.



8. P025, Facility Wide Natural Gas

Operations, Property and/or Equipment Description:

Process natural gas usage (Replaces emission unit Z001)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-17027)	Particulate emissions (PE) shall not exceed 7.3 tons per rolling, 12-month summation. Volatile organic compounds (VOC) emissions shall not exceed 5.3 tons per rolling, 12-month summation. Sulfur dioxide (SO ₂) emissions shall not exceed 0.6 ton per rolling, 12-month summation. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-07(A)(1). See b)(2)a.
b.	OAC rule 3745-31-05(D)	Nitrogen oxides (NO _x) emissions shall not exceed 133.7 tons per rolling, 12-month summation. Carbon monoxide (CO) emissions shall not exceed 80.2 tons per rolling, 12-month summation.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the emission



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

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

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

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

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

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

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

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

e) Reporting Requirements

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

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

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



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

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

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

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and condition shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

c. Emission Limitation :

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

Applicable Compliance Method:



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

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

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

d. Emission Limitation :

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

Applicable Compliance Method:

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

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

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

e. Emission Limitation :

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

Applicable Compliance Method:

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

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

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

f. Emission Limitation:

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

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

- (1) None.



9. R516, Metal Assembly adhesive application

Operations, Property and/or Equipment Description:

Adhesive application to metal parts in the fabrication plant

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)a.

(2) Additional Terms and Conditions

a. The VOC content of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

- a. the name and identification number of each coating/adhesive, as applied; and
- b. the VOC content of each coating/adhesive, in pounds per gallon, excluding water and exempt solvents, as applied.

This information shall be kept with the VOC information required under emissions unit K028 terms and conditions.

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

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings/adhesives. The notification shall include a copy of such record and shall be sent to the Director



(the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.

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

f) Testing Requirements

Emission Limitation:

The VOC content of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

USEPA Method 24 shall be used to determine the VOC contents of the coatings employed. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-21-04(B)(5) and OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

- (1) None.