



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center  
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Columbus, Ohio 43215

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

10/26/2009

Tim McDaniel  
Navistar, Inc. - SAP  
6125 Urbana Road  
P. O. Box 600  
Springfield, OH 45502

Certified Mail  
Facility ID: 0812760220  
Permit Number: P0091690  
County: Clark

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, Springfield Daily News. 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.ohio.gov/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., 7<sup>th</sup> Floor  
Columbus, Ohio 43215

and Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280

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 Regional Air Pollution Control Agency at(937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
RAPCA; Indiana

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



PUBLIC NOTICE  
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit  
Navistar, Inc. - SAP

Issue Date: 10/26/2009

Permit Number: P0091690

Permit Type: Renewal

Permit Description: Title V renewal permit for Navistar truck assembly plant (TAP)

Facility ID: 0812760220

Facility Location: Navistar, Inc. - SAP  
6125 Urbana Road, P. O. Box 600  
Springfield, OH 45502

Facility Description: Heavy Duty Truck 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 Andrew Weisman at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. 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.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0091690  
Facility ID: 0812760220

## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0812760220
Facility Name:	Navistar, Inc. - TAP
Facility Description:	heavy duty truck manufacturing
Facility Address:	6125 Urbana Road, Springfield, OH 45502
Permit #:	P0091690, Renewal
<p>This facility is subject to Title V because it is major for:</p> <p> <input type="checkbox"/> Lead              <input type="checkbox"/> Sulfur Dioxide              <input type="checkbox"/> Carbon Monoxide              <input checked="" type="checkbox"/> Volatile Organic Compounds              <input type="checkbox"/> Nitrogen Oxides  <input type="checkbox"/> Particulate Matter ≤ 10 microns              <input checked="" type="checkbox"/> Single Hazardous Air Pollutant              <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants  <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s)       </p>	

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Was 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



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Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

**B. Facility-Wide Terms and Conditions**

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	
1.a)		40 CFR Part 63 Subpart A	MACT General Provisions, the applicable sections of Subpart A are identified in 40 CFR part 63, Subparts MMMM and PPPP.
1.b)		40 CFR Part 63 Subpart MM MM	Emissions Units K013, K016, K021, K026, K028, K038, K045 and K046 are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating.
1.c)		40 CFR Part 63 Subpart PP PP	Emissions Units K013, K021, and K028 are subject to the NESHAP for Plastic Parts Surface Coating.
1.d)		40 CFR Part 63 Subpart DD DD	<p>d) Emissions units B001, B002, B009, B010 and B011 are subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).</p> <p>If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day deadline for submittal of a 112(j) application does not begin until such</p>



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		D	notification is made by Ohio EPA or U.S. EPA.
2.			Insignificant Emissions Units.

**C. Emissions Unit Terms and Conditions**

<p>Key:          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</p> <p style="text-align: right;">         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          PE = particulate emissions       </p>															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745- )	Other												
B001 B002 B009 B010 B011 K013 K016 K021 K026 K028	0.020 pound of PE per million Btu actual heat input	17-10 (B)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Natural gas or landfill gas only. ET – If requested, particulate testing according to U.S. EPA reference Method 5.
B001 B002 B009 B010 B011 K013 K016 K021 K026	visible PE shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	Y	N	ET – If requested, particulate testing according to U.S. EPA reference Method 9.



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K028 K046															
B009	0.40 ton PE per year. 8.98 tons nitrogen oxides (NOx) per year. 5.37 tons carbon monoxide (CO) per year.	31-05 (A)(3) PTI 08-1152		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Natural gas or landfill gas only. ET – If requested, particulate testing according to U.S. EPA reference Method 5.
B010 B011	1.30 tons PE per year. 2.1 lbs/hour, 8.98 tons nitrogen oxides (NOx) per year. 1.23 lbs/hour, 5.37 tons carbon monoxide (CO) per year.	31-05 (A)(3) PTI 08-1152		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Natural gas or landfill gas only. ET – If requested, particulate testing according to U.S. EPA reference Method 5.
K013	0.75 lb PE/hour,	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR- operate and maintain waterwash control system. ET - If requested, particulate testing according to U.S. EPA reference Method 5. Misc. – The requirements of this rule shall cease to be effective when OAC rule 3745-17-11(C) is approved as a revision to the Ohio SIP.
K013 K016 K021 K028	Control system for PE	17-11 (C)		N	Y	Y	N	N	Y	N	Y	N	N	Y	OR- operate and maintain waterwash control system. Misc. – OAC rule 3745-17-11(C) has not been approved as a revision to the Ohio SIP.



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**Title V Permit Statement of Basis**  
**Permit Number: P0091690**  
**Facility ID: 0812760220**

K013	3.81 lbs VOC/gallon excluding water and exempt solvents, 90.4 lbs VOC/ day and 14.1 tons per year.		40 CFR 52.1870 (c)(89)(i)(A)	N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR – coating usage excluding water and exempt solvents shall not exceed 23.7 gallons per day and 7,415 gallons per year as a rolling 365-day summation. ET – If requested VOC contents will be determined according to U.S. EPA Reference Method 24. Misc. – Variance to compliance with OAC rule 3745-21-09(U)(1)(c).
K016, K028, K038, K046	3.5 lbs VOC/gallon, excluding water and exempt solvents as a daily volume weighted average.	21-09 (U)(1)(c)		N	N	Y	N	N	Y	N	Y	N	Y	N	ET – If requested VOC contents will be determined according to U.S. EPA Reference Method 24.
K016	5.75 lbs PE/hour,	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR- operate and maintain waterwash control system. ET - If requested, particulate testing according to U.S. EPA reference Method 5. Misc. – The requirements of this rule shall cease to be effective when OAC rule 3745-17-11(C) is approved as a revision to the Ohio SIP.
K021	85.5% overall VOC control; 90% destruction efficiency; 34.6 lbs VOC per hour; 553 lbs/day Primer VOC content – 6.10 lbs VOC/ gallon; clear coat VOC content – 3.50 lbs VOC/gallon; all other coatings:	31-05 (A)(3) PTI 08-3475		N	Y	Y	N	N	Y	N	Y	N	Y	N	Limitations – All VOC content limitations are excluding water and exempt solvents as a daily volume weighted average. OR – air flow into the coating enclosure must be maintained under negative pressure, oxidizer temperature shall be not greater than 50 °F below the temperature of the last stack test that showed the emissions unit was in compliance. ET – Emissions testing according to U.S. EPA Reference Method 25A within two year after permit issuance and six months of expiration.



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Permit Number: P0091690  
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	4.68 lbs VOC/gallon; clear coat and all other coatings combined (excluding primers) VOC content - 4.15 lbs VOC/gallon														
K021	66.4 tons per year VOC as a rolling 365 day summation	31-05 (D) PTI 08-3475		N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR – air flow into the coating enclosure must be maintained under negative pressure, oxidizer temperature shall be not greater than 50 °F below the temperature of the last stack test that showed the emissions unit was in compliance. ET – Emissions testing according to U.S. EPA Reference Method 25A within two year after permit issuance and six months of expiration. Misc. – synthetic minor restriction to avoid major new source review.
K021	81% overall control	21-09 (B)(6)		Y	Y	Y	N	N	Y	N	Y	N	N	N	ND- The emissions limitations of this rule are less stringent than the emissions limitations established according to OAC rule 3745-31-05(A)(3).
K026	1.2 lbs VOC/gallon excluding water and exempt solvents, 18.9 lbs/hour and 13.3 tons per year VOC	31-05 (A)(3) PTI 08-3475		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – Coatings usage shall not exceed 52,167 gallons per year. ET – If requested, Emissions testing according to U.S. EPA Reference Methods 18, 25 or 25A.
K028	4.64 lbs VOC/gallon excluding water and exempt solvents for e-coat repair, 3.49 lbs VOC/gallon excluding	31-05 (A)(3) PTI 08-3475		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – E-coat repair coating use shall not exceed 168 gallons per year. Maximum annual interior coating use shall not exceed 16,424 gallons per year. ET – If requested VOC contents will be determined according to U.S. EPA Reference Method 24.



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	water and exempt solvents for interior color coating, 15.2 lbs/hour and 29.1 tons per year VOC														
K028	2.03 lbs PE/hour,	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR- operate and maintain waterwash control system. ET - If requested, particulate testing according to U.S. EPA reference Method 5. Misc. – The requirements of this rule shall cease to be effective when OAC rule 3745-17-11(C) is approved as a revisions to the Ohio SIP.
K038	0.80 lb VOC/gallon excluding water and exempt solvents for e-coat repair, 7.2 lbs/hour and 6.0 tons per year VOC	31-05 (A)(3) PTI 08-2393		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – Coatings usage shall not exceed 52,167 gallons per year. ET – If requested VOC contents will be determined according to U.S. EPA Reference Method 24.
K045	1.7 lbs/hour and 6.9 tons per year VOC	(A)(3) PTI 08-4114		N	Y	Y	N	N	Y	N	Y	N	Y	N	ET – If requested VOC contents will be determined according to U.S. EPA Reference Method 24.
K045	4.9 lbs VOC per gallon excluding water and exempt solvents	21-09 (U)(1)(g)		N	N	Y	N	N	Y	N	Y	N	Y	N	ET – If requested VOC contents will be determined according to U.S. EPA Reference Method 24.
K046	1.81 lbs PE/hour,	17-11 (B)(1)		N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR- operate and maintain dry filter PE control system. ET - If requested, particulate testing according to U.S. EPA reference Method 5. Misc. – The requirements of this rule shall cease to be effective when OAC rule 3745-17-11(C) is approved as a revisions to the Ohio SIP.
K046	26.0 tons	31-05		N	Y	Y	N	N	Y	N	Y	N	Y	Y	OR – VOC usage shall not exceed 51,00 pounds per





**State of Ohio Environmental Protection Agency  
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**DRAFT**

**Air Pollution Title V Permit  
for  
Navistar, Inc. - SAP**

Facility ID: 0812760220  
Permit Number: P0091690  
Permit Type: Renewal  
Issued: 10/26/2009  
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  
 Navistar, Inc. - SAP

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**Draft Title V Permit**

**Permit Number:** P0091690

**Facility ID:** 0812760220

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0812760220

Facility Description: heavy duty truck manufacturing

Application Number(s): A0023083

Permit Number: P0091690

Permit Description: Title V renewal permit for Navistar truck assembly plant (TAP)

Permit Type: Renewal

Issue Date: 10/26/2009

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:

Navistar, Inc. - SAP  
6125 Urbana Road  
P. O. Box 600  
Springfield, OH 45502

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

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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 Regional Air Pollution Control Agency. 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:** P0091690

**Facility ID:** 0812760220

**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 Regional Air Pollution Control Agency.

*(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:** P0091690

**Facility ID:** 0812760220

**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) 7.

2. 40 CFR Part 63, Subpart A

The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A (including the table(s) and appendices referenced in Subpart A).

3. 40 CFR Part 63, Subpart M

Emissions Units K013, K016, K021, K026, K028, K038, K045 and K046 are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart M).

a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart M.

The final rules found in 40 CFR Part 63, Subpart M establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

all coating operations as defined in 40 CFR 63.3981;

all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

[Authority for term 40 CFR 63.3883, 40 CFR 63.3882(b), and 40 CFR 63.3940]

b) The permittee, has chosen to use a combination of the “compliant material” and “without add-on control” options for these emissions units.

When using the “compliant material” option, the permittee shall not apply any coating in these emissions units with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3951 and 63.3952 for the compliance period.

When using the “without add-on control” option, the permittee shall maintain these emissions units in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance



period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.

[Authority for term 40 CFR 63.3891(a), 40 CFR 63.3900(a), 40 CFR 63.3940, 40 CFR 63.3941, and 40 CFR 63.3942 40 CFR 63.3950, 40 CFR 63.3951 and 40 CFR 63.3952]

- c) The permittee shall comply with the applicable emissions limits operational limits and work practices of 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3890	Emissions limits
63.3892(a)	Operating limits
63.3893(a)	Work Practices
63.6(e)(1)	Start up Shutdown and Malfunction Plan

- d) The permittee shall comply with the applicable record keeping requirements of 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3930	Record keeping
63.3931	Records maintenance and duration
63.3940	Initial compliance demonstration date for compliant coatings
63.3941	Initial compliance demonstration procedures for compliant coatings
63.3942	Continuous compliance for compliant coatings
63.3950	Initial compliance demonstration without add-on controls
63.3951	Initial compliance demonstration procedures without add-on controls
63.3952	Continuous compliance without add-on controls

- e) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart Mmmm, including the following sections:

63.3891(a)	Exceedance reporting for compliant coatings
63.3910	Notification requirements
63.3920(a)	Reporting requirements
63.3941(e)	Initial compliance reporting for compliant coatings
63.3951(e)	Initial compliance reporting without add-on controls

4. 40 CFR Part 63, Subpart Pppp

Emissions Units K013, K021, and K028 are subject to the NESHAP for Plastic Parts Surface Coating.

- a) The permittee shall comply with the applicable provisions of the NESHAP for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Pppp.



The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for HAP, work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- all coating operations as defined in 40 CFR 63.4581;
- all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to the requirements and limitations of this NESHAP on April 19, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on April 30, 2008.

[Authority for term 40 CFR 63.4483, 40 CFR 63.4482(b), and 40 CFR 63.4540]

- b) The permittee, has chosen to use a combination of the “compliant material” and “without add-on control” options for these emissions units.

When using the “compliant material” option, the permittee shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

When using the “without add-on control” option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

[Authority for term 40 CFR 63.4491(a), 40 CFR 63.4500(a), 40 CFR 63.4540, 40 CFR 63.4541, 40 CFR 63.4542, 40 CFR 63.4550, 40 CFR 63.4551 and 40 CFR 63.4552]

- c) The permittee shall comply with the applicable emissions limits operational limits and work practices of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4490(b)(1)	Emissions limits
63.4492	Operating limits
63.4493	Work Practices
63.6(e)(1)	Start up Shutdown and Malfunction Plan



- d) The permittee shall comply with the applicable record keeping requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4530	Record keeping
63.4531	Records maintenance and duration
63.4540	Initial compliance demonstration date for compliant coatings
63.4541	Initial compliance demonstration procedures for compliant coatings
63.4542	Continuous compliance for compliant coatings
63.4550	Initial compliance demonstration without add-on controls
63.4551	Initial compliance demonstration procedures without add-on controls
63.4552	Continuous compliance without add-on controls

- e) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4510	Notification requirements
63.4520	Reporting requirements

- 5. Emissions units B001, B002, B009, B010 and B011 are subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

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

- 6. The following insignificant emissions units are located at this facility.

- B004 2.2 MMBtu/hour hot water heater
- B007 1.75 MMBtu/hour pump house boiler
- B008 8.369 MMBtu/hour natural gas and liquified petroleum gas fired boiler No. 1 (PTI 08-1152)
- B012 3 - 0.563 MMBtu/hour tank farm boilers
- G002 Gasoline dispensing facility (PTI 08-1793)
- L001 Wheel bearing cold cleaner (PTI 08-3003)
- L004 Tool room parts washer (PTI 08-2206)
- L005 Electrical department parts washer
- L006 K38 parts washer
- L007 K39 parts washer
- L009 Garage parts washer M-40 (PTI 08-2297)
- L011 Dept. 82 mineral spirits tank
- L016 Cold cleaner, dept 92 (PTI 08-2444)
- L022 Equipment repair cold cleaner, dept 67 FPF (PTI 08-2443)
- L027 Cold cleaner, dept 82 (PTI 08-2604)
- P018 Steam Jenny Nos 1 and 2 (PTI 08-2187)
- P019 Radial arm saw (PTI 08-2187)



- P020 Windshield washer tank filling
- P025 W/S frame clean and prep (PTI 08-04114)
- T017 8,000 gallon brake fluid tank (PTI 08-1793)
- T019 8,000 gallon power steering fluid tank (PTI 08-1793)
- T020 8,000 gallon waste mineral spirits tank (PTI 08-1793)
- T021 8,000 gallon waste oil tank (PTI 08-1854)
- T024 10,000 gallon mineral oil tank (PTI 08-1854)
- T025 10,000 gallon transmission fluid tank (PTI 08-1854)
- T026 12,000 gallon crank case lube tank (PTI 08-1854)
- T027 12,000 gallon antifreeze tank (PTI 08-1854)
- T030 12,000 gallon gear lube tank (PTI 08-1854)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within 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.

- 7. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the “de minimis” criteria established in OAC rule 3745-15-05.

- B700 Tank farm back-up generator (formerly Z004)
- B701 WWTP back-up generator (Formerly Z005)
- B702 Firewater pump, south (Formerly Z006)
- B703 Firewater pump, north (Formerly Z007)
- G700 Tank farm load/unload (Formerly Z008)
- G701 Diesel operations (Formerly Z012)
- P700 Welding operations (Formerly Z015)
- P701 Final assembly fluid filling operations (Formerly Z016)
- P702 Engineering development center (Formerly Z017)
- P703 Repair stations (Formerly Z019)
- P704 Engine testing ((Formerly Z020)
- K700 "Doll-up" line 1, dept 92 (Formerly Z021)
- K701 "Doll-up" line 2, dept 92 (Formerly Z022)
- K702 "Doll-up" line 3, dept 92 (Formerly Z023)
- P705 WWTP operations (Formerly Z024)
- K703 Spot coating (Formerly Z025)
- K704 CAS sealer operations (Formerly Z027)
- B704 Domestic hot water heaters (Formerly Z028)
- B705 Barrel dock heaters (Formerly Z029)



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0091690

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## **C. Emissions Unit Terms and Conditions**



**1. K013, DEPARTMENT 92 REPAIR PAINT BOOTHS AND OVENS**

**Operations, Property and/or Equipment Description:**

Surface coating of miscellaneous trucks and component parts (metal and plastic) for repair, touch-up, and final operations with dry filters, water curtain 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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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 52.1870(c)(89)(i)(A)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 90.4 pounds per day and 14.1 tons per year.  The VOC content of the coatings employed shall not exceed 3.81 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.
b. OAC rule 3745-17-11(B)(1)	See b)(2)a. The particulate emissions (PE) from this emissions unit shall not exceed 0.75 pound per hour.
c. OAC rule 3745-17-11(C)	See b)(2)b.
d. OAC rule 3745-17-10(B)	See b)(2)b. and b)(2)c. The PE from the oven associated with this emissions unit shall not exceed 0.020 pound particulate per million Btu (mmBtu) actual heat input.
e. OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d. 40 CFR Part 63, Subpart M, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic



Applicable Rules/Requirements

Applicable Emissions Limitations/Control Measures

HAP per liter (gallon), during each 12-month compliance period.

- e. 40 CFR, Part 63, Subpart PPPP Surface Coating of Plastic Parts and Products [40 CFR 63.4490(b)(4)]

See Section B.3.

The organic HAP emissions from plastic parts coating in this emissions unit shall be limited to no more than 1.34 kg (1.34 lb) organic HAP per kg (lb) of coating solids used during each 12-month compliance period.

- f. 40 CFR Part 63, Subpart A MACT General Provisions

See Section B.4.

The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart MMMM and Table 2 of 40 CFR Part 63, Subpart PPPP.

Additional Terms and Conditions

In lieu of the requirements of OAC rule 3745-21-09(U)(1)(c), the VOC content of all coatings employed in this emissions unit shall not exceed 3.81 pounds VOC per gallon of coating applied, excluding water and exempt solvents, as a daily, volume-weighted average of all coatings employed in any one day.

This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate emissions. After OAC rule 3745-17-11(C) is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly emissions limitations shall be void.

The permittee shall operate the dry filtration and/or waterwash control system whenever this emissions unit is in operation.

c) Operational Restrictions

The maximum daily coating usage, excluding water and exempt solvents, for this emissions unit shall not exceed 23.7 gallons.

[Authority for term 40 CFR 52.1870(c)(89)(i)(A)]

The maximum annual coating usage, excluding water and exempt solvents, for this emissions unit shall not exceed 7,415 gallons, as a rolling, 365-day summation.

[Authority for term OAC rule 40 CFR 52.1870(c)(89)(i)(A)]



The permittee shall operate and maintain the dry filtration and/or waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[Authority for term OAC rule 3745-17-11(C)(1) and (2)(b) and OAC rule 3745-77-07(C)(1)]

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

The permittee shall collect and record the following information each day for the coating line:

The name and identification number of each coating, as applied.

The VOC content, excluding water and exempt solvents, of each coating as applied, in pounds per gallon.

The volume, in gallons, excluding water and exempt solvents, of each coating, as applied.

The total volume, in gallons, excluding water and exempt solvents, of all coatings, as applied.

The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{voc2}$ .

The total VOC emission rate for all the coatings, as applied, in pounds.

The rolling, 365-day summation of the coating usage, excluding water and exempt solvents, for all the coatings employed, in gallons.

[If only compliant coatings are employed in this emissions unit, the permittee does not have to calculate a daily volume-weighted average VOC content for all the coatings employed.]

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

The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration and/or waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC 3745-17-11(C)(2)(a)]

The permittee shall conduct periodic inspections of the dry filtration and/or waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



[Authority for term OAC rule 3745-17-11(C)(2)(c)]

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration and/or waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]

The permittee shall document each inspection (periodic and annual) of the dry filtration and/or waterwash control system and shall maintain the following information:

- the date of the inspection;
- a description of each/any problem identified and the date it was corrected;
- a description of any maintenance and repairs performed; and
- the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(d) and (f)]

The permittee shall maintain records that document any time periods when the dry filtration and/or waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry filtration and/or waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

The permittee shall submit annual reports that identify:

- the total volume, in gallons, of coatings employed and
- the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation of 3.81 lbs/gallon, excluding water and exempt solvents. This notification shall include a copy of such record and shall be sent



to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

The permittee shall submit quarterly deviation (excursion) reports that identify:

each day during which the daily VOC emission limitation of 90.4 pounds;

the daily coating usage restriction of 23.7 gallons;

and/or the rolling, 365-day coating usage restriction of 7,415 gallons were exceeded, as well as the corrective action(s) taken to achieve compliance;

any daily record showing that the dry filtration and/or waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

[Authority for term OAC rules 3745-15-03(B)(1)(a), 3745-15-03(C) and 3745-77-07(C)(1)]

f) Testing Requirements

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

Emission Limitation -

The VOC content of the coatings employed shall not exceed 3.81 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit. In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings.

Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 90.4 pounds per day.

Applicable Compliance Method -



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

Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 14.11 tons per year.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in d)(1) and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2,000 pounds per ton.

Emission Limitation -

The PE from this emissions unit shall not exceed 0.75 pound per hour.

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation may be used:

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

$$E = \text{PE rate (lbs/hour)}$$

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

amount of coating solids used

CE = control efficiency of the control equipment

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(10).

Emission Limitation -

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method -

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the oven associated with this emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the oven associated with this emissions unit (mmBtu/hour).

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).



Emission Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

Emission Limitation -

The maximum daily coating usage, excluding water and exempt solvents, for this emissions unit shall not exceed 23.7 gallons.

Applicable Compliance Method -

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

Emission Limitation -

The maximum annual coating usage, excluding water and exempt solvents, for this emissions unit shall not exceed 7,415 gallons, as a rolling, 365-day summation.

Applicable Compliance Method -

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

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

On an annual basis, the permittee shall use U.S. EPA Method 24 to determine the VOC contents for all of the coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

g) **Miscellaneous Requirements**

The permittee shall pursue a coating reformulation program to develop coatings that, when employed, will cause this emissions unit to emit no more than 3.5 lbs VOC/gallon, excluding water and exempt solvents, based on a daily, volume-weighted average of all the coatings employed in this emissions unit in any one day. Annual reports which document this on-going research and development shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by February 1 of each year. The reports shall contain, at a minimum, letters from coating suppliers, outlining current efforts, results of any trial coating application, and any projected use of an alternative



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coating. Upon successful trial of a new coating, the permittee shall expeditiously begin to utilize the lower VOC content coating.



**2. K016, LINE NO. 1 CHASSIS BOOTH**

**Operations, Property and/or Equipment Description:**

Truck chassis surface coating spray booth

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.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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)(c)	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 5.75 pounds per hour.
d.	OAC rule 3745-17-11(C)	See b)(2)a.
e.	OAC rule 3745-17-10(B)	See b)(2)a. and b)(2)b.
f.	40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The particulate emissions (PE) from the oven associated with this emissions unit shall not exceed 0.020 pound particulate per million Btu (mmBtu) actual heat input. The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.
g.	40 CFR Part 63, Subpart A MACT General Provisions	See Section B.3.
		The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40



Applicable Rules/Requirements

Applicable Emissions Limitations/Control Measures  
CFR Part 63, Subpart M

**Additional Terms and Conditions**

This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate emissions. After OAC rule 3745-17-11(C) is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly emissions limitations shall be void.

The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

**c) Operational Restrictions**

The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[Authority for term OAC rule 3745-17-11(C)(1) and (2)(b) and OAC rule 3745-77-07(C)(1)]

The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

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

The permittee shall collect and record the following information each day for the line:

The name and identification number of each coating, as applied.

The VOC content (in lbs/gallon, excluding water and exempt solvents) and the volume, in gallons (excluding water and exempt solvents) of each coating, as applied.

The daily, volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for C voc,2.

[If only compliant coatings are employed in this emissions unit, the permittee does not have to calculate a daily, volume-weighted average VOC content for all the coatings employed.]

[Authority for term OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1)] .



The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC 3745-17-11(C)(2)(a)]

The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]

The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

- the date of the inspection;
- a description of each/any problem identified and the date it was corrected;
- a description of any maintenance and repairs performed; and
- the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(d) and (f)]

The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)].

e) Reporting Requirements



The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation of 3.5 pounds/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

[Authority for term OAC rules 3745-15-03(B)(1)(a), 3745-15-03(C) and 3745-77-07(C)(1)]

The permittee shall submit annual reports that indentify:

the total volume, in gallons, of coatings employed and

the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

f) **Testing Requirements**

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

Emission Limitation -

The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in d)(1) of this permit. In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA



provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation -

The PE from this emissions unit shall not exceed 5.75 pounds per hour.

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation may be used:

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

$$E = \text{PE rate (lbs/hour)}$$

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

CE = control efficiency of the control equipment

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(10).

Emission Limitation

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the oven associated with this emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the oven associated with this emissions unit (mmBtu/hour).

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

Emission Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0091690

**Facility ID:** 0812760220

**Effective Date:** To be entered upon final issuance

g) Miscellaneous Requirements

None.



**3. K021, TOP COAT LINES 157 & 158**

**Operations, Property and/or Equipment Description:**

Surface Coating Line and Ovens for Medium- and Heavy-duty Trucks (metal and plastics) - [Formerly K021=Line 157 only, now 157 & 158] with water curtain and thermal incinerator.

- 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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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 08-3475	<p>The minimum volatile organic compounds (VOC) overall control efficiency shall be at least 85.5% from the coating line and minimum 90% destruction efficiency, for the thermal incinerator</p> <p>The VOC emissions from this emissions unit shall not exceed 34.6 pounds per hour and 553.3 pounds per day.</p> <p>The VOC content of the primers employed shall not exceed 6.10 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.</p> <p>The VOC content of the clear coats employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.</p> <p>The VOC content of all other coatings, (excluding primers and clear coats) employed shall not exceed 4.68 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.</p> <p>The VOC content of the clear coats and</p>



Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	all other coatings, (excluding primers) employed shall not exceed 4.15 pounds per gallon, as applied, excluding water and exempt solvents as a combined daily, volume-weighted average.
	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), 3745-21-09(B)(6) and 40 CFR, Part 63, Subpart PPPP and 40 CFR, Part 63, Subpart MMMM.
b. OAC rule 3745-31-05(D) PTI 08-3475 (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) review)	The VOC emissions from this emissions unit shall not exceed 66.4 tons per year, as a rolling, 365-day summation, including primer coatings.
c. OAC rule 3745-17-10(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound particulate per million Btu (mmBtu) actual heat input.
d. OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e. OAC rule 3745-21-09(B)(6)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).
f. OAC rule 3745-17-11(C)	See b)(2)c. and b)(2)d.
g. 40 CFR Part 63, Subpart MMMM, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.
	See Section B.3
h. 40 CFR, Part 63, Subpart PPPP Surface Coating of Plastic Parts and Products [40 CFR 63.4490(b)(1)]	The organic HAP emissions from plastic parts coating in this emissions unit shall be limited to no more than 0.16 kg (0.16 lb) organic HAP per kg (lb) of coating solids used during each 12-month compliance period.
	See Section B.4
i. 40 CFR Part 63, Subpart A MACT General Provisions	The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart MMMM and Table



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
j.	40 CFR Part 64, Compliance Assurance Monitoring	2 of 40 CFR Part 63, Subpart PPPP. See c)(1), c)(2), d)(1), d)(4), through d)(6), d)(13) and d)(14)

**Additional Terms and Conditions**

All VOC emissions from the booth and flash areas shall be vented to the thermal incinerator, except for VOC emissions resulting from the application of primer coatings.

[Authority for term OAC rule 3745-31-05(A)(3) and PTI 08-3475]

The enclosure associated with this emissions unit is not a permanent total enclosure, as defined in 40 CFR Part 51, Appendix M, Method 204.

[Authority for term OAC rule 3745-31-05(A)(3) and PTI 08-3475]

Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate emissions.

[Authority for term OAC rule 3745-17-11(C)]

The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

[Authority for term OAC rule 3745-17-11(C)]

**c) Operational Restrictions**

The enclosure associated with this emissions unit shall be maintained under negative pressure when the emissions unit is in operation. The direction of the air flow through all natural draft openings shall be into the enclosure.

[Authority for term OAC rule 3745-31-05(A)(3), PTI 08-3475, and 40 CFR Part 64]

The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour period of operation 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. The most recent emissions test that demonstrated compliance was conducted on February 10, 2009 with an average combustion chamber temperature of 1650 °F. This combustion chamber temperature is subject to revision, if during the term of this permit, additional stack tests are conducted that demonstrated the emissions unit is in compliance.

[Authority for term OAC rule 3745-31-05(A)(3), PTI 08-3475 and 40 CFR Part 64]

The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or



operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[Authority for term OAC rules 3745-17-11(C)(1) and (2)(b) and 3745-77-07(C)(1)]

The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

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

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information for each day for the thermal incinerator:

A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature measured during the most recent emission test that demonstrated that the emissions unit was in compliance.

Upon detecting an excursion of the thermal oxidizer temperature indicator range listed in c)(2), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

[Authority for term OAC rules OAC rule 3745-31-05(A)(3) 3745-77-07(C)(1), PTI 08-3475 and 40 CFR Part 64]

The permittee shall collect and record the following information each day for the coating line:

The name, identification number and type (i.e., primer, clear, etc) of each coating, as applied.

The VOC content of each coating, as applied, in pounds per gallon of coating, excluding water and exempt solvents.

The volume, in gallons, of each coating employed, excluding water and exempt solvents.



The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the primer coatings.

The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the clear coatings.

The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the coatings, excluding primer and clear coatings.

The volume-weighted average VOC content, in pounds per gallon of coating, excluding water and exempt solvents, for all the coatings, excluding primer coatings.

The total uncontrolled VOC emissions for all the coatings employed, excluding primer, in pounds or tons.

The total VOC emissions for all the primer coatings employed, in pounds or tons.

The calculated, controlled VOC emission rate for all the coatings, excluding primer, in pounds or tons per day. The controlled VOC emission rate shall be calculated using 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. (The last emissions test was conducted in February 10, 2009 with an overall control efficiency of 90 percent. Until additional tests are conducted the overall control efficiency factor shall be  $1 - 0.90$ .)

The total daily VOC emission rate, in pounds or tons, i.e.,  $d)(i)$  plus  $d)(j)$

The number of hours the emissions unit was in operation.

The average hourly VOC emission rate, in pounds per hour, i.e.,  $d)(k)$  divided by  $d)(l)$ .

The rolling, 365-day summation of the VOC emission rate, in tons, for all the coatings (including primer coatings).

[If only compliant coatings are employed in this emissions unit, the permittee does not have to calculate a daily, volume-weighted average VOC content for all the coatings employed.]

[Authority for term OAC rules 3745-31-05(A)(3), 3745-77-07(C)(1), 3745-21-09(B)(3) and PTI 08-3475]

The permittee shall collect and record each month the amount of purge solvent employed and the amount of emissions from the purge solvent, in pounds or tons. The amount emitted shall be calculated using an AP-42 emission factor of 1.42 pounds of VOC emissions per ton of solvent, from Table 4.7-1, and the overall control efficiency determined from the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

The permittee shall operate and maintain magnehelics which measure the pressure, in inches of water, in each airhouse. The magnehelics shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals with any modifications deemed necessary by the permittee.



The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for monitoring of air flow into the coating enclosure. Streamers provide a continuous visual indication of air flow into the enclosure and magnehelic gauges are used to monitor negative pressure across enclosure openings.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1), PTI 08-3475 and 40 CFR Part 64]

Streamers shall be employed to demonstrate that the air flow through the natural draft openings is into the enclosure, when the emissions unit is in operation.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1), PTI 08-3475 and 40 CFR Part 64]

The permittee shall record the following information for each day when the emissions unit is in operation:

The direction of air flow through the natural draft openings shall be documented once per shift based upon visual inspections of the streamers, i.e., into or out of the enclosure.

The pressure in each air house associated with this emissions unit shall be documented once per shift, in inches of water.

A log of the downtime for the capture (collection) system, control device, and monitoring equipment when the emissions unit is in operation.

[Authority for term OAC rules OAC rule 3745-31-05(A)(3) 3745-77-07(C)(1), PTI 08-3475 and 40 CFR Part 64]

The permittee shall conduct negative pressure verification tests through the use of smoke tubes during any required emission testing conducted in accordance with methods and procedures as specified in f)(2) of this permit.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC 3745-17-11(C)(2)(a)]

The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]



In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]

The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

- the date of the inspection;
- a description of each/any problem identified and the date it was corrected;
- a description of any maintenance and repairs performed; and
- the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(d) and (f)]

The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

Whenever the monitored values for inward air flow and negative pressure across the enclosure in c)(1) and/or the average temperature within the combustion chamber of the thermal oxidizer deviate from the indicator range specified in c)(2) the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began and ended;
- the magnitude of the deviation;
- the date(s) the investigation was conducted;
- the names of the personnel who conducted the investigation; and
- the findings and recommendations of the investigation.

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

In response to each required investigation required in d)(13) to determine the cause of a deviation, the permittee shall take prompt corrective action to restore inward air flow and negative pressure across the enclosure specified in c)(1) and/or to bring the operation of the control equipment within the indicator range specified in c)(2). The



permittee shall maintain records of the following information for each corrective action taken:

a description of the corrective action;

the date and time the corrective action was completed; and

the names of the personnel who performed the work.

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

[Authority for term: 40 CFR Part 64 CAM and 3745-77-07(C)(1)]

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1)]

e) Reporting Requirements

The permittee shall submit quarterly deviation (excursion) reports that include the following:

All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated that the emissions unit was in compliance.

All exceedances of the average hourly VOC emission limitation of 34.58 pounds.

All exceedances of the daily VOC emission limitation of 553.24 pounds.

All exceedances of the rolling, 365-day VOC emission limitation of 66.4 tons.

any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

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

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that any of the daily, volume-weighted average VOC contents exceeded the applicable limitations specified in b)(1). The notification shall include a copy of such record and shall be sent to the Director (the



appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include the following:

A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

All periods of time, when the emissions unit was in operation, during which the air flow through the natural draft openings was not maintained into the enclosure.

All periods of time, when the emissions unit was in operation, during which the pressure in each air house was not negative.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

[Authority for term OAC rules 3745-15-03(B)(1)(a), 3745-15-03(C) and 3745-77-07(C)(1)]

The permittee shall submit annual reports that identify:

the total volume, in gallons, of coatings employed and

the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

f) Testing Requirements

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

Emission Limitation



The VOC emissions from this emissions unit shall not exceed 34.58 pounds per hour.

Applicable Compliance Method -

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

If requested, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emission Limitation -

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 553.24 pounds per day.

Applicable Compliance Method -

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

Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 66.40 tons per year, as a rolling, 365-day limit

Applicable Compliance Method -

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

Emission Limitation

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the oven associated with this emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the oven associated with this emissions unit (mmBtu/hour).

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

Emission Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

Emission Limitations -

The VOC content of the primers employed shall not exceed 6.10 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

The VOC content of the clear coats employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

The VOC content of all other coatings, (excluding primers and clear coats) employed shall not exceed 4.68 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.

The VOC content of the clear coats and all other coatings, (excluding primers) employed shall not exceed 4.15 pounds per gallon, as applied, excluding water and exempt solvents as a combined daily, volume-weighted average.

Applicable Compliance Method -

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

In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

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

The emission testing shall be conducted within two years after the final issuance of this permit and within six months prior to permit expiration.

The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOC.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approval by the appropriate Ohio EPA District Office or local air agency.



The capture efficiency shall be determined using the prescribed method of testing as described in PTI No.: 08-3475 (demonstration that the system is under negative pressure at natural draft openings, oven exits, and doors to the sludge building shall be conducted through the use of smoke tubes. Negative pressure for the air houses shall be demonstrated using magnehelic gauges on every air house.), or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA'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 the validity of the alternative, and may approve the use of the alternative if approval does not contravene any other applicable requirement.) 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. 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.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the

submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

g) Miscellaneous Requirements

None.



**4. K026, E-COATLINE: E-1 AND E-2**

**Operations, Property and/or Equipment Description:**

Twin Pre-treatment and E-Coat Dip Lines and Ovens for surface coating of cabs and component parts (metal and plastics)

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.

None.

b) Applicable Emissions Limitations and/or Control Requirements

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 08-3475	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.2 lbs /gallon of E-coat prime coating, as a monthly, volume-weighted average, excluding water and exempt solvents  See b)(2)a. and b)(2)b.  The VOC emissions from this emissions unit shall not exceed 18.9 pounds per hour (as a monthly average) and 31.3 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B), and 40 CFR, Part 63, Subpart Mmmm.
b.	OAC rule 3745-17-10(B)	The particulate emissions (PE) from the ovens associated with this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic



Applicable Rules/Requirements

Applicable Emissions Limitations/Control Measures

HAP per liter (gallon), during each 12-month compliance period.

- e. 40 CFR Part 63, Subpart A  
MACT General Provisions

See Section B.3

The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M.

Additional Terms and Conditions

The combination of coating components added to the dip tank (i.e., pigment, resin, and glycol ethers) shall meet 1.2 pounds of VOC per gallon of coating, as a monthly, volume-weighted average, excluding water and exempt solvents.

Based on information supplied by the permittee, it has been determined that the VOC content limitation of 1.2 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average is more stringent than the VOC content limitation specified by OAC rule 3745-21-09(U)(1)(c), i.e., of 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average. The information provided indicates that pure solvent is manually added to the dip tank only 3 or 4 times per month, and in quantities of less than 110 gallons of pure solvent per addition. If the monitoring, record keeping and reporting requirements established in sections d)(2) and e)(2) of this permit show that the permittee is adding quantities of pure solvent that are substantially greater than 110 gallons/per addition and/or that the frequency of these additions is greater than 4 times per month, the permit may be opened by the Ohio PEA, and the permittee may be required to demonstrate compliance with the daily, volume-weighted average VOC content limitation of 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents..

- c) Operational Restrictions

The maximum annual E-coat coating material usage rate for this emissions unit shall not exceed 52,167 gallons, excluding water and exempt solvents.

[Authority for term PTI 08-3475 and OAC rule 3745-31-05(A)(3).

- d) Monitoring and/or Recordkeeping Requirements

The permittee shall collect and record the following information each month for the electrocoating dip tank:

the name and identification number of each coating material added to the dip tank;

the VOC content, excluding water and exempt solvents, in pounds per gallon, of each coating material added to the dip tank;

the volume, in gallons of each coating material added to the dip tank, excluding water and exempt solvents;



the monthly, volume-weighted average VOC content of the combination of coating materials added to the dip tank, in pounds per gallon, excluding water and exempt solvents [the sum of d)(1)b times d)(1)(c for all coating materials, divided by the total volume, in gallons, excluding water and exempt solvents, of all coating materials added to the system];

the total VOC emission rate, in pounds, i.e., the summation of d)(1)b times d)(1)(c for all the coating materials added;

the total number of hours of operation;

the average hourly VOC emission rate (e/f), in pounds (average); and

the total volume, in gallons of coating materials added to the electro deposition dip tank, excluding water and exempt solvents.

[Authority for term OAC rules 3745-21-09(B)(3)(l)(ii) 3745-31-05(A)(3) and 3745-77-07(C)(1) and PTI 08-3475]

On the days when only pure solvent is added to the dip tank, the permittee shall record and maintain the amount of pure solvent added, in gallons/day, and the date of the addition.

[Authority for term OAC rules 3745-21-09(B)(3)(l)(ii) 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

e) Reporting Requirements

The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the average hourly VOC emission rate of 18.9 pounds, and the actual average hourly VOC emission rate for each such month.

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

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

The permittee shall notify the Director (Ohio EPA Division of Air Pollution Control District Office or local air agency) in writing of any monthly record showing an exceedance of the VOC content limitation of 1.2 lbs VOC/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent within 30 days following the end of the calendar month.

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

The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include the following information:

the total VOC emissions, in tons;

the coating usage for all coatings employed, in gallons; and



the dates each month that only pure solvent was added to this emissions unit and the amount of pure solvent added each such day.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

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

The permittee shall submit annual reports that indentify:

the total volume, in gallons, of coatings employed and

the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

f) Testing Requirements

Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

Emission Limitation -

1.2 pounds VOC per gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average of all coating components added to the electrodeposition tank

Applicable Compliance Method -

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

The monthly, volume-weighted average of all the materials added to the dip tank shall be calculated using the following equation:

$$\text{monthly, volume-weighted average} = [\text{summation of } (G_i \times \text{VOC}_i)] / [\text{summation of } G_j \text{ for } i = 1 \text{ to } n]$$

where:

$$i = 1, 2, 3, \dots n$$

n = the total number of the different types of materials added to the dip tank for that month

G<sub>i</sub> = the volume, in gallons of material i (excluding water and exempt solvents) added to the dip tank for that month

VOC<sub>i</sub> = the VOC content of material i, in pounds/gallon of material, excluding water and exempt solvents



Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 18.9 pounds per hour (as a monthly average).

Applicable Compliance Method -

Compliance with the hourly allowable VOC emission limitation shall be based upon the record keeping specified in d)(1) of this permit.

Emission Limitation –

The VOC emissions from this emissions unit shall not exceed 31.3 tons per year.

Compliance with the annual allowable VOC emission limitation shall be based upon the record keeping specified in d)(1) and shall be the sum of the monthly VOC emission rates for the calendar year, divided by 2,000 pounds per ton.

If requested, compliance with the hourly allowable VOC emission limitation shall be based upon the results of stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emission Limitation -

The PE from the ovens associated with this emissions unit shall not exceed 0.020 pound per mmBtu of actual heat input.

Applicable Compliance Method -

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the oven associated with this emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the oven associated with this emissions unit (mmBtu/hour).

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03 and U.S. EPA Reference Method 5.

Emission Limitation -

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

Applicable Compliance Method -

If requested, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 using the methods and procedures specified in U.S. EPA Reference Method 9.

Emission Limitation -



The maximum annual E-coat coating material usage rate for this emissions unit shall not exceed 52,167 gallons, excluding water and exempt solvents.

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in d)(1) and shall be the sum of the monthly coating usages, excluding water and exempt solvents, for the calendar year.

U.S. EPA Method 24 shall be used to determine the VOC contents of the coating in the electrodeposition system. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24..

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-3475]

g) Miscellaneous Requirements

None.



**5. K028, INTERIOR FINISH LINE**

**Operations, Property and/or Equipment Description:**

Interior Paint Spray Booth and Ovens for surface coating truck cabs and component parts (metal and plastics)

- 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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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 08-3475	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 15.2 pounds per hour, excluding cleanup materials and 29.1 tons per year, including cleanup.</p> <p>The VOC content of the E-coat repair coating employed shall not exceed 4.64 lbs pounds per gallon, excluding water and exempt solvents.</p> <p>The VOC content of the interior color coating employed shall not exceed 3.49 lbs pounds per gallon, excluding water and exempt solvents.</p>
b. OAC rule 3745-17-10(B)(1)	<p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B) and 3745-21-09(U)(1)(c) and 40 CFR, Part 63, Subpart PPPP and 40 CFR, Part 63, Subpart MMMM.</p> <p>The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound particulate per million Btu (mmBtu) actual heat input.</p>
c. OAC rule 3745-17-07(A)(1)	<p>Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(B)(1)	The PE from this emissions unit shall not exceed 2.03 pounds per hour.
e.	OAC rule 3745-17-11(C)	See b)(2)a.
f.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)a. and b)(2)b. The VOC content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents as a daily, volume-weighted average.
g.	40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.
h.	40 CFR, Part 63, Subpart Pppp Surface Coating of Plastic Parts and Products [40 CFR 63.4490(b)(1)]	See Section B.3. The organic HAP emissions from plastic parts coating in this emissions unit shall be limited to no more than 0.16 kg (0.16 lb) organic HAP per kg (lb) of coating solids used during each 12-month compliance period.
i.	40 CFR Part 63, Subpart A MACT General Provisions	See Section B.4. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart Mmmm.

**Additional Terms and Conditions**

This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate emissions. After OAC rule 3745-17-11(C) is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly emissions limitations shall be void.

[Authority for term OAC rule 3745-17-11(C)]

The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

[Authority for term OAC rule 3745-17-11(C)]



c) Operational Restrictions

The maximum annual E-coat repair coating usage for this emissions unit shall not exceed 168 gallons, excluding water and exempt solvents.

[Authority for term PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The maximum annual interior color coating usage for this emissions unit shall not exceed 16,424 gallons, excluding water and exempt solvents.

[Authority for term PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The permittee shall operate the water curtain whenever this emissions unit is in operation.

[Authority for term PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

The permittee shall collect and record the following information each day for the coating line:

The name, identification number and type (i.e., E-coat repair and/or interior color) of each coating, as applied.

The VOC content (in lbs/gallon, excluding water and exempt solvents) and the volume, in gallons (excluding water and exempt solvents) of each coating, as applied.

The daily, volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

The total daily VOC emission rate for all the coatings employed, in pounds.

The total number of hours the emissions unit was in operation.

The average hourly VOC emission rate, in pounds per hour (average), i.e., d)(1)d divided by d)(1)e.

The total volume, in gallons of all the interior coatings used (summation of d)(1)b for all interior color coatings).

The total volume, in gallons of all the E-coat repair coatings (summation of d)(1)b for all E-coat repair coatings).

[Authority for term OAC rules 3745-21-09(B)(3) 3745-31-05(A)(3) 3745-77-07(C)(1), PTI 08-3475]

The permittee shall collect and record the following information each month for the coating line:



The name and identification of each cleanup material employed.

The volume, in gallons of each cleanup material employed.

The VOC content of each cleanup material employed, in pounds per gallon.

The volume, in gallons and VOC content of the cleanup material recovered for recycling or treatment.

The VOC emission rate for all the cleanup materials [summation  $d(2)b \times d(2)c$ ] for all cleanup materials - (volume, in gallons of cleanup materials recovered  $\times$  the VOC content of such cleanup materials)], in pounds.

The total VOC emissions for all the coatings employed (calculated by summing the daily VOC emission rates, from  $d(2)d$  above, for the calendar month), in pounds

The total VOC emissions for all the coatings and cleanup materials  $d(2)e + d(2)f$ , in pounds.

[Authority for term OAC rules 3745-21-09(B)(3) 3745-31-05(A)(3) and (3745-77-07(C)(1), and PTI 08-3475]

The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC 3745-17-11(C)(2)(a)]

The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term OAC rule 3745-17-11(C)(2)(c)]



The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

- the date of the inspection;
- a description of each/any problem identified and the date it was corrected;
- a description of any maintenance and repairs performed; and
- the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(d) and (f)]

The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[Authority for term OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily, volume-weighted average VOC content of 3.5 lbs VOC/gallon of coating, and/or the VOC contents of 4.64 lbs VOC/gallon of E-coat repair coating and 3.49 lbs VOC/gallon of interior color coating were exceeded. The notification shall include a copy of such record shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries of the total VOC emissions for all coatings and cleanup materials employed in this emissions unit. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The permittee shall submit quarterly deviation (excursion) reports that identify:

- all exceedances of the average hourly VOC emission rate of 15.2 pounds, and the actual average hourly VOC emission rate for each such day.



any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

The permittee shall submit annual reports that identify:

the total volume, in gallons, of coatings employed and

the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

f) Testing Requirements

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

Emission Limitation

The VOC emissions from this emissions unit shall not exceed 15.2 pounds per hour.

Applicable Compliance Method -

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

If requested, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 29.13 tons per year.

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in d)(2) and shall be the sum of the twelve monthly VOC emission rates for the calendar year.



Emission Limitations -

4.64 lbs VOC/gallon of E-coat repair coating, excluding water and exempt solvents

3.49 lbs VOC/gallon of interior color coating, excluding water and exempt solvents

3.5 lbs VOC/gallon of coating, as a daily, volume-weighted average of all coatings employed, excluding water and exempt solvents

Applicable Compliance Method -

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

In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation -

168 gallons/year E-coat repair coating usage, excluding water and exempt solvents

Applicable Compliance Method -

Compliance shall be based upon record keeping specified in d)(1) and shall be the sum of the daily E-coat repair coating usages for the calendar year.

Emission Limitation -

16,424 gallons/year interior color coating usage, excluding water and exempt solvents

Applicable Compliance Method -

Compliance shall be based upon record keeping specified in d)(1) and shall be the sum of the daily interior color coating usages for the calendar year.

Emission Limitation -

The PE from this emissions unit shall not exceed 2.03 pounds per hour.

Applicable Compliance Method -

To determine the actual worst case emissions rate for particulates, the following equation may be used:



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

$E = \text{PE rate (lbs/hour)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the}$

$\text{amount of coating solids used}$

$CE = \text{control efficiency of the control equipment}$

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(10).

Emission Limitation

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the oven associated with this emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the oven associated with this emissions unit (mmBtu/hour).

If requested, compliance shall be based on the results of stack testing conducted in accordance with OAC rule 3745-17-03(B)(9).

Emission Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

When requested, compliance shall be determined through visible emission observations performed in accordance OAC rule 3745-17-10 and U.S. EPA Reference Method 9.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-3475 and OAC rule 3745-31-05(A)(3)]

g) Miscellaneous Requirements

None.

**6. K038, SEALER LINE, DEPT. 68**

**Operations, Property and/or Equipment Description:**

Surface Coating Sealer Application of cabs and component parts (metal and plastics)



- 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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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 08-2393	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 7.2 pounds per hour, 0.50 ton/month, and 6.0 tons per year.  The VOC content of the sealer employed shall not exceed 0.80 pound per gallon, as applied, excluding water and exempt solvents.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and 40 CFR, Part 63, Subpart Mmmm.
b. OAC rule 3745-21-09(U)(1)(c)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
c. 40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.
d. 40 CFR Part 63, Subpart A MACT General Provisions	See Section B.3. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart Mmmm.

**Additional Terms and Conditions**

The 7.2 lbs/hour was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.



c) Operational Restrictions

The maximum annual sealer usage for this emissions unit shall not exceed 15,000 gallons, excluding water and exempt solvents.

[Authority for term PTI 08-2393 and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

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

The name and identification number of each coating, as applied.

The VOC content of each coating (in lbs/gallon, excluding water and exempt solvents), as applied.

The volume, in gallons, (excluding water and exempt solvents) of each coating employed.

The total VOC emissions for all the coatings employed [summation of [d)(1)b x d)(1)c] for all coatings, divided by 2000], in tons.

The total volume, in gallons, of the all the coatings employed (summation of d)(1)c for all coatings).

[Authority for term OAC rules 3745-21-09(B)(3) 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-2393]

e) Reporting Requirements

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-2393 and OAC rule 3745-31-05(A)(3)]

The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries of the total VOC emissions and coating usage for all coatings employed in this emissions unit. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-2393 and OAC rule 3745-31-05(A)(3)]

The permittee shall submit quarterly deviation (excursion) reports that show all exceedance of the monthly OC emission limitation of 0.5 ton.

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.



[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-2393 and OAC rule 3745-31-05(A)(3)]

The permittee shall submit annual reports that indentify:

the total volume, in gallons, of coatings employed and

the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

f) Testing Requirements

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

Emission Limitation

The VOC emissions from this emissions unit shall not exceed 7.2 pounds per hour.

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly coating usage (9 gallons/hour) by the maximum VOC content of 0.80 lb VOC/gallon.

If requested, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 0.50 ton/month.

Applicable Compliance Method -

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

Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 6.0 TPY VOC

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in d)(1) and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

Emission Limitation -

The VOC content of the sealer employed shall not exceed 0.80 pound per gallon, as applied, excluding water and exempt solvents.



Applicable Compliance Method -

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

If requested, In accordance with OAC rule 3745-21-04(B)(5), U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation -

The maximum annual sealer usage for this emissions unit shall not exceed 15,000 gallons, excluding water and exempt solvents.

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in d)(1) and shall be the sum of the monthly usage records for the calendar year.

[Authority for term OAC rule 3745-77-07(C)(1), PTI 08-2393 and OAC rule 3745-31-05(A)(3)]

g) Miscellaneous Requirements

None.



**7. K045, WINDSHIELD INSTALLATION**

**Operations, Property and/or Equipment Description:**

Adhesive bonding of glass windshield to metal cab frame

- 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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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 08-4114	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.7 pounds per hour , excluding cleanup; 6.9 tons per year, including cleanup.
b. OAC rule 3745-21-09(U)(1)(g)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(g) and 3745-21-07(G) and 40 CFR, Part 63, Subpart Mmmm.. The VOC content of the coatings employed shall not exceed 4.9 pounds per gallon, excluding water and exempt for the coatings used for metal parts.
c. 40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.
d. 40 CFR Part 63, Subpart A MACT General Provisions	See Section B.3. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart Mmmm.



Additional Terms and Conditions

The 1.7 lbs/hour VOC emission limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

None.

d) Monitoring and/or Recordkeeping Requirements

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

The name and identification number of each coating and cleanup material, as applied.

The VOC content of each coating (lbs/gallon, excluding water and exempt solvents), as applied, and whether it was applied to metal or non-metal parts.

The volume, in gallons, of each coating, excluding water and exempt solvents.

The total VOC emissions for all the coatings employed (summation of d)(1)b x d)(1)c for all coatings, divided by 2000), in tons.

The VOC content of each cleanup material employed, in pounds per gallon.

The volume, in gallons, of each cleanup material employed.

The total VOC emissions for all the cleanup materials employed (summation of d)(1)e x d)(1)f for all cleanup materials, divided by 2000), in tons.

The total VOC emissions for all the coatings and cleanup materials employed [d)(1)d + d)(1)g], in tons.

[Authority for term OAC rules 3745-21-09(B)(3) 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-4114]

e) Reporting Requirements

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying coating (i.e., for VOC content) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-4114]

The permittee shall submit annual reports that identify:

the total volume, in gallons, of coatings employed and

the total VOC emissions, in tons, for this emissions unit.



The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

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

f) Testing Requirements

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

Emission Limitation

The VOC emissions from this emissions unit shall not exceed 1.7 pounds per hour, excluding cleanup.

Applicable Compliance Method

Compliance may be determined by multiplying the maximum hourly adhesive coating usage (gallons/hr) by the maximum VOC content of all the adhesive coatings (lbs/gallon).

If requested, compliance with the hourly allowable VOC emission limitation shall be based upon the results of stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emission Limitation

The VOC emissions from this emissions unit shall not exceed 6.9 tons per year, including cleanup.

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in d)(1) and shall be the sum of the twelve monthly VOC emission rates for the calendar year.

Emission Limitation

The VOC content of the coatings employed shall not exceed 4.9 pounds per gallon, excluding water and exempt for the coatings used for metal parts.

Applicable Compliance Method -

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

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 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



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demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-4114]

g) Miscellaneous Requirements

None.



**8. K046, LINE NO. 2 CHASSIS COATING. BOOTH**

**Operations, Property and/or Equipment Description:**

Truck chassis surface coating spray booth

- 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.

None.

- b) Applicable Emissions Limitations and/or Control Requirements

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 08-04893	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 40 CFR Part 63, Subparts A and Mmmm.
b.	OAC rule 3745 -31-05(A)(3)(a)(ii)	See b)(2)a.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 26.0 tons per year (TPY) based upon a rolling 12-month summation including coatings, clean up material and natural gas combustion.
d.	OAC rule 3745-21-09(U)(1)(c)	The VOC content of the coatings applied in this emissions unit shall not exceed 3.5 pounds VOC per gallon of coating applied, excluding water and exempt solvents.
e.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 1.81 pounds per hour.
f.	OAC rule 3745-17-07(A)(1)	See b)(2)b. Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
g.	40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts Coating MACT [40 CFR Part 63.3890(b)(1)]	The organic hazardous air pollutant (HAP) emissions from metal parts coating in this emissions unit shall be limited to no more than 0.31 kg (2.6 lbs) organic HAP per liter (gallon), during each 12-month compliance period.



Applicable Rules/Requirements

Applicable Emissions Limitations/Control Measures

- h. 40 CFR Part 63, Subpart A  
MACT General Provisions

See Section B.3.  
The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M. The applicable provisions of 40 CFR 63.1-15 are identified in Table 2 of 40 CFR Part 63, Subpart M.

Additional Terms and Conditions

The Best Available Technology (BAT) requirements under OAC rule 3745-31-5(A)(3) do not apply to the particulate, nitrogen oxides and carbon monoxide emissions from this air contaminant source because the uncontrolled potential to emit for these pollutants are less than 10 TPY.

This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate emissions. After OAC rule 3745-17-11(C) is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly emissions limitations shall be void.

- c) Operational Restrictions

The total VOC input from coatings and clean up materials employed in this emissions unit shall not exceed 51,000 pounds based upon a rolling 12-month summation.

[Authority for term OAC rule 3745-31-05(D) and PTI 08-04881].

- d) Monitoring and/or Recordkeeping Requirements

The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

the name and identification number of each coating, as applied; and

the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for  $C_{VOC,2}$ :

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

$D_C$  = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

$V_S$  = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$



$W_{VM}$  = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

[Authority for term OAC rules 3745-21-09(B)(3) 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

The permittee shall collect and record the following information each month for this emissions unit.

The company identification of each coating and clean up material employed.

The volume, in gallons, of each coating and clean up material employed.

The VOC content of each coating and clean up material, in pounds per gallon.

The VOC emission rate for all coatings and clean up materials, in pounds or tons per month (the sum of d)(1)b x d)(1)c for all coating and clean up materials).

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

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 rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

e) Reporting Requirements

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the VOC content of the coating applied in this emissions unit exceeded 3.5 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.



[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

The permittee shall submit quarterly deviation (excursion) reports which identify the following information; all exceedances of the rolling, 12-month limitation on VOC usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the event occurs.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-04881]

f) **Testing Requirements**

Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

**Emissions Limitation -**

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

**Applicable Compliance Method -**

Compliance shall be based on coating formulation data and if required VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A.

**Emissions Limitation -**

The total VOC input from coatings and clean up materials employed in this emissions unit shall not exceed 51,000 pounds based upon a rolling 12-month summation.



Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in d)(2) and shall be the sum of the monthly emissions rates for the previous 12 months.

Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 26.0 TPY based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in d)(2) and shall be the sum of the monthly emissions rates for the previous 12 months plus 0.5 ton VOC (potential VOC emissions from natural gas combustion in drying oven; 175.2 million cubic feet x 5.5 lbs VOC per million cubic feet burned (AP-42, Table 1.4-1, 7/98)).

Emission Limitation:

The particulate emissions from this emissions unit shall not exceed 1.81 lbs per hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

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

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

If requested, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If requested, compliance with the above visible emission limitation 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 U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term OAC rules 3745-31-05(A)(3) 3745-77-07(C)(1) and PTI 08-4881]



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g) Miscellaneous Requirements

None.



**9. Emissions Unit Group - Large Boilers: B001, B002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B001	Natural Gas, Landfill Gas and LPG-fired Boiler; 30 MMBTU per hour
B002	Natural Gas, Landfill Gas and LPG-fired Boiler; 30 MMBTU per hour

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:

None.

b) Applicable Emissions Limitations and/or Control Requirements

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-17-10 (B)(1)	The particulate emissions (PE) from these emissions units shall not exceed 0.020 pound of particulate emissions per million Btu (mmBtu) actual heat input.
b.	OAC rule 3745-17-07(A)	The opacity of the visible PE from any stack associated with these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	40 CFR Part 63, Subpart DDDDD	See b)(2)a.

**Additional Terms and Conditions**

Emissions units B001, B002, B009, B010 and B011 are subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

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

c) Operational Restrictions

The permittee shall burn only natural gas, landfill methane gas and/or LPG in this emissions unit.



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

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

For each day during which the permittee burns a fuel other than natural gas, landfill methane gas and/or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

e) **Reporting Requirements**

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, landfill methane gas, and/or LPG was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

f) **Testing Requirements**

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

Emission Limitation

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hour).

For the use of LPG, compliance may be determined by multiplying the maximum LPG capacity of the emissions unit (331 gallons/hour) by the AP-42, Table 1.5-1 (revised 10/96) emission factor for LPG (0.6 lb PE/1000 gallons), and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hour).

If requested, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(9) using the methods and procedures specified in U.S. EPA Reference Method 5 of 40 CFR Part 60, Appendix A.

Emission Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



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Applicable Compliance Method

If requested, compliance with the above visible emission limitation 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 U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A.

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

g) Miscellaneous Requirements

None.



**10. Emissions Unit Group - Small Boilers: B009, B010, B011,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B009	Natural Gas, Landfill Gas and LPG-fired Boiler; 14.6 MMBTUH
B010	Natural Gas, Landfill Gas and LPG-fired Boiler; 14.7 MMBTUH
B011	Natural Gas, Landfill Gas and LPG-fired Boiler; 14.7 MMBTUH

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:

None.

b) Applicable Emissions Limitations and/or Control Requirements

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) Emissions Unit B009, PTI 08-1152 Emissions Unit B010 and B011, PTI 08-04156	<p><u>Emissions Unit B009:</u> The particulate emissions (PE) from this emissions unit shall not exceed 0.40 ton per year.</p> <p>The nitrogen oxide (NOx) emissions from this emissions unit shall not exceed 8.98 tons per year.</p> <p>The carbon monoxide (CO) emissions from this emissions unit shall not exceed 5.37 tons per year.</p> <p><u>Emissions Units B010 and B011:</u> The PE from each of these emissions units shall not exceed 1.30 tons per year</p> <p>The NOx emissions from each of these emissions units shall not exceed 2.1 lbs/hour and 9.20 tons per year.</p> <p>The CO emissions from each of these emissions units shall not exceed 1.23 lbs/hour and 5.40 tons per year.</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the requirements of OAC</p>



Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b. OAC rule 3745-17-10 (B)(1)	rules 3745-17-07(A), and 3745-17-10(B). The particulate emissions (PE) from these emissions units shall not exceed 0.020 pound of particulate emissions per million Btu (mmBtu) actual heat input.
c. OAC rule 3745-17-07(A)	The opacity of the visible PE from any stack associated with these emissions units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d. 40 CFR Part 63, Subpart DDDDD	See b)(2)b.

**Additional Terms and Conditions**

The hourly and annual emissions for each of these emissions limits were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop, monitoring, record keeping and reporting requirements to ensure compliance with these limits.

Emissions units B001, B002, B009, B010 and B011 are subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

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

c) **Operational Restrictions**

The permittee shall burn only natural gas, landfill methane gas and/or LPG in this emissions unit.

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

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

For each day during which the permittee burns a fuel other than natural gas, landfill methane gas and/or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

e) **Reporting Requirements**

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, landfill methane gas, and/or LPG was burned in this emissions unit. Each report shall be submitted within 30days after the deviation occurs.



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

f) Testing Requirements

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

Emission Limitation -

The PE from emissions unit B009 shall not exceed 0.40 ton per year.

The PE from emissions unit B010 shall not exceed 1.30 tons per year

The PE from emissions unit B011 shall not exceed 1.30 tons per year.

Applicable Compliance Method -

For emissions unit B009, compliance may be determined by multiplying the maximum hourly LPG burning capacity of the emissions unit (161 gallons/hour) by the AP-42, Table 1.5-1 (revised 07/08) emission factor for LPG (0.2 lb PE (filterable)/1000 gallons of LPG) and multiplying by 8,760, and then dividing by 2000.

For emissions units B010 and B011, as long as compliance with the annual emissions 0.020 pound particulate per mmBtu emission limitation is maintained, compliance with the annual emissions limit will also be maintained. The annual emissions limit was calculated by multiplying the 0.020 pound particulate per mmBtu emission limitation times the maximum heat input capacity of each boiler and 8,760 hours per year and dividing by 2,000 pounds per ton.

Emissions Limitation -

The NOx emissions from emissions unit B009 shall not exceed 8.98 tons per year.

The NOx emissions from emissions unit B010 and B011 each shall not exceed 2.1 lbs/hour and 9.20 tons per year.

Applicable Compliance Method -

Compliance may be determined by multiplying the maximum hourly LPG burning capacity of the emissions unit (161 gallons/hour) by the AP-42, Table 1.5-1 (revised 07/08) emission factor for LPG (13 lbs NOx/1000 gallons of LPG) and multiplying by 8,760, and then dividing by 2000.

Emissions Limitation -

The CO emissions from emissions unit B009 shall not exceed 5.37 tons per year.

The CO emissions from emissions unit B010 and B011 each shall not exceed 1.23 lbs/hour and 5.39 tons per year.



Applicable Compliance Method -

Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (0.0147mmcf/hour) by the AP-42, Table 1.4-1 (revised 07/98) emission factor for LPG (84 lbs CO/mmcf) and multiplying by 8,760, and then dividing by 2000.

Emission Limitation

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cubic feet/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas (1.9 lbs PE (filterable)/mm cubic feet), and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hour).

Compliance may be determined by multiplying the maximum hourly LPG burning capacity of the emissions unit (161 gallons/hour) by the AP-42, Table 1.5-1 (revised 07/08) emission factor for LPG (0.2 lb PE (filterable)/1000 gallons of LPG), and dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hour).

If requested, the permittee shall demonstrate compliance with the lbs/mmBtu limitation above in accordance with OAC rule 3745-17-03(B)(9) and U.S. EPA reference method 5.

Emission Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03 and U.S. EPA Reference Method 9.

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

g) Miscellaneous Requirements

None.