



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/8/2011

Certified Mail

Roger Brown
Chrysler Group LLC - Toledo North Assembly
4400 Chrysler Drive
Toledo, OH 43608-4000

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448010414
Permit Number: P0108007
Permit Type: Initial Installation
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

[X] Synthetic Minor Determination

[] Netting Determination

2. Source Description:

Chrysler Group LLC (Chrysler) owns or is in co-operation with several automobile manufacturing plants in Toledo, Ohio. The operations associated with the Toledo North Assembly Plant (TNAP) and with the Toledo Supplier Park (TSP) are identified as premise number 0448010414. Chrysler requested a modification of PTI 04-01102, for emissions units P008, P012, K021, K022 and K023 at the Toledo North Assembly Plant (TNAP) as part of a proposed plant expansion. PTI 04-1102 was originally issued in 1998 and was subsequently modified in 1999, 2000 and 2005. The permit actions associated with the expansion project are identified as P0108007, P0108040 and P0108063. This project also includes installation of additional makeup air heaters which are all exempt from permitting requirements, an emergency generator issued as a PBR, and facility-wide increased VOC emissions associated with the projected production rate increase; all of which will be included with the total project emissions for purposes of PSD review.

An expansion of the body shop at Toledo North Assembly Plant (TNAP) is necessary to accommodate the 2013 model year vehicle platform. During the expansion a new foam injection process, the injection of a two-component material into the vehicle cavities to add sound deadening, will be added to the production line. The new emissions unit is identified as a source of VOC emissions as the two liquid component compounds react chemically to form an inert solid. This emissions unit was not included in the original 1998 PTI, and will be added to the facility as a new emissions unit through this action.

3. Facility Emissions and Attainment Status:

The attainment status of Lucas County is:

- SO2: Attainment
CO: Unclassifiable/Attainment
Lead: Not Designated
NOx: Unclassifiable/Attainment
Ozone: 8-hr non-attainment
PM-10: Unclassifiable

The existing 0448010414 facilities reported following emissions for calendar year 2010:

Table with 6 columns: Actual emissions, CO, NOX, PM10, SO2, VOC. Values: 18.11, 28.70, 3.65, 0.21, 193.34.

The combined facilities at this location constitute a major source for NOx, VOC and HAPs.



4. Source Emissions:

The estimated unrestricted potential to emit for this source is 23.27 tons of VOC with a federally enforceable restriction to 8.67 tons of VOC per year. The entire project is expected to result in an increase in actual VOC emissions of 39.0 tons per year.

5. Conclusion:

Issuance of this permit will not involve PSD review and the addition of this process to the existing facility meets the requirement for new emissions unit in the State of Ohio. A synthetic minor restriction of 8.67 tons of VOC per year will be added to the permit at the company's request. The permit should be issued as a draft/final as the facility is Title V.

6. Please provide additional notes or comments as necessary:

See below

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	8.67



General description - Chrysler identifies a foam injection process; the injection of a two-component material into the vehicle cavities to add sound deadening, as a source of VOC emissions as discussed in the permit application technical support document (which has been included in the permit strategy write-up of P0108040). This process unit will be permitted as a separate, new emissions unit. NSPS Subpart MM—Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, does not apply to sound deadeners. Subpart IIII—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks applies to this source as a coating operation: a material applied to a substrate for functional purposes including deadeners. In accordance with 63.3090(d) the permittee must limit average organic HAP emissions from all deadener materials to no more than 0.010 kg/kg (lb/lb) of deadener material used during each month.

BAT determination – As Chrysler volunteered an enforceable emissions limitation of 8.67 tons per year, which is equated to PTE at production rate of 327,000 vehicles per year, and indicated that the proposed foam product was expected to emit 0.0530 pounds of VOC per 2.7591 gallons of unreacted components (0.02 pound VOC per gallon and 0.053 pound VOC per vehicle).

For BAT we would equate the process to the similar well reviewed installation of PTI 04-01358, as issued in 2004 for Chrysler emissions unit P304, where a LAER restriction of 0.14 pound VOC per gallon and 8.3 ton of VOC per year was established based on a production rate of 200,064 vehicles for an equivalent emissions factor of 0.083 lbs of VOC per vehicle.

At a maximum production rate of 64 vehicles per hour, this equates to an unrestricted BAT equivalence of 5.31 lb/hr and 23.27 tons per year as VOC at 8760 hours of operation. Since per OEPA guidance, only one limitation need be set for non-PSD sources, the BAT for this emissions unit will be established as 0.14 pound VOC per gallon. The permit will require compliance through the use of compliant coatings (vs. volume weighted daily averaged) which will allow recordkeeping to be performed on a monthly basis. BAT will include compliance with the MACT. Chrysler volunteered as an enforceable emissions limitation of 8.67 tons per year. Typically this request would result in a limitation on the coating usage (gallons per month). In this emissions unit, we were directed by OEPA to accept a tons per year limitation to be demonstrated by monthly calculation. This provision will be included in the permit.

Applicable regulations - OAC 3745-31-05 and OAC 3745-21-09(U)(1)(d). OAC 3745-31-05 requires BAT which will be set as 0.14 pound VOC per gallon as a maximum. OAC rule 3745-21-09(C)(2) specifically excludes sound deadening materials from 21-09(C)(1) applicability. OAC 3745-21-09(U)(1)(d) requires 3.5 #/gal excluding water and exempt solvents as a daily average (to be demonstrated here on a monthly basis through the usage of compliance coatings) where OAC rule 3745-21-09(B)(3)(f) allows monthly recordkeeping. 63.3090(d) limits the average organic HAP emissions from all deadener materials to no more than 0.010 kg/kg (lb/lb) of deadener material used during each month. An enforceable emissions limitation of 8.67 tons per year will be added to the permit under the authority of OAC rule 3745-31-05(D).

To establish a limitation as enforceable for a new source, Ohio EPA requires a start-up table. As a basis for the table, Chrysler provided information suggesting a maximum operating rate for the facility could be established as 60 vehicles per hour, 21 hours per day, 6 days a week. At 4.5 weeks per month and 0.083 lbs of VOC per vehicle:

$$(60 \text{ v/hr})(21 \text{ hr/d})(6 \text{ d/w})(4.5 \text{ w/m})(0.083 \text{ #/v}) \div (2000 \text{ #/t}) = 1.41 \text{ tons of VOC per month maximum}$$

Permit allowable emissions - 0.14 pound VOC per gallon and 0.010 lb HAP/lb of deadener material used during each month and 8.67 tons VOC per year.

Potential to emit - PTE is equal to the restricted maximum emissions (8.67 tons VOC per year).

Actual emissions - Actual emissions will be estimated at a projected actual production rate of 60 vehicles per hour and 327,000 vehicles annually equal to 3.18 lb/hr and 8.67 tons per year as VOC.

Fees - 1 Permit to Install, 0 to 1000 lbs/hr @ \$200 = \$200

PUBLIC NOTICE PUBLIC HEARING
ISSUANCE OF DRAFT AIR POLLUTION Permit-To-Install
Chrysler Group LLC - Toledo North Assembly

Issue Date: 6/8/2011
Facility ID: 0448010414
Facility Location: Chrysler Group LLC - Toledo North Assembly
4400 Chrysler Drive,
Toledo, OH 43608-4000
Facility Description: Automobile Manufacturing

Permit Number: P0108007
Permit Type: Initial Installation
Permit Description: The purpose of this project is to add a new foam injection process, the injection of a two-component material into the vehicle cavities to add sound deadening, will be added to the production line. The new emissions unit is identified as a source of VOC emissions as the two liquid component compounds react chemically to form an inert solid.

Permit Number: P0108040
Permit Type: OAC 3745-31 Modification
Permit Description: This project includes installation of additional makeup air heaters which are all exempt from permitting requirements, an emergency generator issued as a Permit-by-Rule, and facility-wide increased VOC emissions associated with the projected production rate increase to accommodate the 2013 model year vehicle platform.

Permit Number: P0108063
Permit Type: Administrative Modification
Permit Description: Replace some but not all welding equipment for the automated welding process (P012), and the emissions previously released indoors will be ducted and vented to atmosphere.

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of air pollution control permits-to-install (PTI) for air contaminant sources at the location identified above on the date indicated. Installation of the air contaminant sources may proceed upon final issuance of the PTI.

A public hearing and information session on the draft air permit is scheduled for 6:30 p.m., Thursday, July 14, 2011, at West Toledo YMCA Auditorium, 2110 Tremainsville Road, Toledo OH 43613. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard. All interested persons are entitled to attend or be represented and give written or oral comments on the draft permit at the hearing.

Written comments must be received by July 18, 2011 in order to be considered. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Bob Kossow, Toledo Division of Environmental Services, (419) 936-3015, or 348 South Erie Street, Toledo, Ohio, 43602. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Chrysler Group LLC - Toledo North Assembly

Facility ID:	0448010414
Permit Number:	P0108007
Permit Type:	Initial Installation
Issued:	6/8/2011
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Chrysler Group LLC - Toledo North Assembly

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Authorization

Facility ID: 0448010414
Facility Description: Automotive and Light Duty Truck Assembly Plant.
Application Number(s): A0041730, A0041768, A0041778
Permit Number: P0108007
Permit Description: Installation of purfoam sound deadening line.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/8/2011
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Chrysler Group LLC - Toledo North Assembly
4400 Chrysler Drive
Toledo, OH 43608-4000

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108007

Permit Description: Installation of purfoam sound deadening line.

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

Emissions Unit ID:	P014
Company Equipment ID:	Purfoam
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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



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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

16. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

17. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

18. 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.

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to the applicable requirements of 40 CFR Part 63, Subparts A and IIII: P014. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.
3. Recordkeeping for netting purposes as required by P0108007, P0108040 and P0108063 for VOCs.
 - a) The permittee shall monitor the emissions of VOC that are emitted by emissions units P008, P012, P014, K021, K022, and K023 associated with Chrysler Group, LLC's PTI 04-1102; and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the NSR project increases the design capacity or potential to emit of that regulated NSR pollutant at such emissions unit.
 - b) If the unit is an existing unit, the permittee shall submit a report through the Ohio EPA's eBusiness Center: Air Services online web portal if the annual emissions, in tons per year, from Chrysler Group, LLC's PTI 04-1102, as modified by P0108007, P0108040 and P0108063, exceed the baseline actual emissions (as documented and maintained pursuant to paragraph (C)(1)(c) of OAC rule 3745-31-10, by a significant amount for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to paragraph (C)(1)(c) of OAC rule 3745-31-10. The permittee's pre-construction projection is listed in Table 1 below where construction is planned to be completed in fall of 2012 in time for start of assembly for Model Year 2013. Such report shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal within 60 days after the end of such year. The report shall contain the following:
 - (1) The name, address and telephone number of the major stationary source;
 - (2) The annual emissions as calculated pursuant to 3.a) above; and
 - (3) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).



Table 1 NSR for VOC - Baseline Actual Emissions vs Potential/Projected Actual Emissions

	Baseline 2002/2003 Actual Emissions (tons/yr)	*Potential Emissions **Projected Actual Emissions (tons/yr)	Incremental Difference (tons/yr)
	VOC	VOC	VOC
New & Modified Sources at PTE*			
P008 new burners	0	0.34	0.34
K021 new burners	0	0.10	0.10
K022 new burners	0	0.10	0.10
K023 new burners	0	0.10	0.10
P012	0	0	0
P014	0	8.67	8.67
Make up air heaters	0	1.28	1.28
New Emergency Generator (PBR)	0	0.06	0.06
Emissions from Associated Units **	0	10.65	10.65
K021	3.02	3.52	0.50
K022	1.35	1.57	0.22
K023	229.16	266.97	37.81
P007	162.04	188.78	26.74
P008	38.55	73.02	34.47
P009	35.24	41.05	5.81
P010	0.85	0.99	0.14
Subtotals	470.21	586.55	116.34
Excludable Emissions Expansion Project Totals			<77.34> 39

C. Emissions Unit Terms and Conditions



1. P014, Purfoam

Operations, Property and/or Equipment Description:

application station for foam sound deadening

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists five rows (a-e) detailing regulatory requirements for VOC and HAP emissions from foam deadening operations.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subparts A and IIII.
- b. The maximum foam sound deadening usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$8.67 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) + 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of unreacted foam sound deadener material i , gallons
 VOC_i = the mass of VOC (emitted) per volume of unreacted foam sound deadener material i , pounds per gallon.

- c. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- d. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII upon the date of initial startup of this affected source.

c) Operational Restrictions

- (1) The permittee shall employ techniques appropriate to minimize the emissions of VOC from this emissions unit.
- (2) The maximum coating usage for this emissions unit shall not exceed the limit calculated by the following formula: $2000E \geq \sum_{i=1}^n (Q_i)(VOC_i)$

Where:

E = cumulative VOC emissions, in tons

Q_i = usage of unreacted foam sound deadener material i , gallons

VOC_i = the mass of VOC (emitted) per volume of unreacted foam sound deadener material i , pounds per gallon

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels calculated based on the cumulative VOC emissions of the following table:



Table with 2 columns: Month(s) and Maximum Allowable Cumulative VOC Emissions, in tons. Rows range from 1 to 1-12.

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon the restriction of b)(2)b.

(3) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record monthly the mass of VOC (emitted) per unreacted volume of each foam sound deadener as injected, in pounds per gallon of unreacted foam, excluding water and exempt solvents.
(2) The permittee shall collect and record on a monthly basis the following information for all foam sound deadener operations:
a. the company identification for each unreacted foam sound deadener utilized;
b. the number of gallons of each unreacted foam sound deadener utilized, Qi;
c. the mass of VOC (emitted) per volume of unreacted foam sound deadener material, VOCi;
d. the total VOC emissions from all foam sound deadener materials utilized, in tons;
e. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative total quantity of VOC emissions for each calendar month, and
f. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month total quantity of VOC emissions, in tons.



(3) Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

(4) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

e) Reporting Requirements

(1) The permittee shall notify the Director (the Toledo Division of Environmental Services) of any monthly record showing the use of noncomplying coatings, i.e., any coating for which emissions of VOC exceeds 3.5 pounds of per gallon of unreacted foam excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) within 30 days following the end of the calendar month.

(2) The permittee shall submit quarterly deviation reports that identify the following:

- a. any monthly record showing the use of noncomplying coatings, i.e., any coating for which emissions of VOC exceeds 0.14 pound of per gallon of unreacted foam;
- b. 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 total quantity of VOC emissions; and
- c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall submit quarterly deviation reports that identify any exceedance of the rolling, 12-month emissions limitation.

The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

(4) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

f) Testing Requirements

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

a. Emission Limitation:

0.14 pound of VOC per gallon.

Applicable Compliance Method:

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures



specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

3.5 pounds of VOC per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

8.67 tons of VOC as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2)f.

d. Emission Limitation:

0.010 kg/kg (lb/lb) HAP.

Applicable Compliance Method:

In accordance with 40 CFR 63.7 and 40 CFR 63.3151, the permittee shall determine the individual organic HAP content for each group of materials used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7.

g) Miscellaneous Requirements

(1) None.