State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-04749
Fac ID: 1318598662

DATE: 6/12/2008

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

TRW Automotive, LLC
Alan Berkley
19501 Emery Road
Warrensville Heights, OH 44128

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CLAA**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 6/12/2008**
Terms and Conditions	**Effective Date: 6/12/2008**

FINAL PERMIT TO INSTALL 13-04749

Application Number: 13-04749

Facility ID: 1318598662

Permit Fee: **$1600**

Name of Facility: TRW Automotive, LLC

Person to Contact: Alan Berkley

Address: 19501 Emery Road
Warrensville Heights, OH 44128

Location of proposed air contaminant source(s) [emissions unit(s)]:
19501 Emery Road
Warrensville Heights, **Ohio**

Description of proposed emissions unit(s):
Four engine test stands for gasoline and diesel engines (P001 - P004).

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. 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.)

3. Records Retention Requirements

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.

4. 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.

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 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
NOx	15.88
CO	79.82
SO_2	1.01
PM/PM_{10}	1.11
OC	4.02

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P001) - Engine Dynamometer test cell No. 1

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3) (Installed in January 2003)	From burning gasoline NOx emissions shall not exceed 1.73 lbs/hour CO emissions shall not exceed 66.98 lbs/hour SO_2 emissions shall not exceed 0.09 lb/hour PM/PM_{10} emissions shall not exceed 0.11 lb/hour VOC emissions shall not exceed 2.52 lbs/hour From burning diesel NOx emissions shall not exceed 15.10 lbs/hour CO emissions shall not exceed 3.25 lbs/hour SO_2 emissions shall not exceed 0.99 lbs/hour PM/PM_{10} emissions shall not exceed 1.06 lbs/hour OC emissions shall not exceed 1.23 lbs/hour
OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is equivalent to or less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See term and condition A.2.b
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V, Nonattainment New Source Review and Prevention of Significant Deterioration.	See term and condition A.2.a

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2. Additional Terms and Conditions

2.a The total, combined mass emissions from burning gasoline from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	1.99 tons/year (tpy);
CO	76.83 tpy;
SO2	0.10 tpy;
PM/PM_{10}	0.13 tpy; and
VOC	2.89 tpy.

The total, combined mass emissions from burning diesel fuel from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	13.89 tpy;
CO	2.99 tpy;
SO2	0.91 tpy;
PM/PM_{10}	0.98 tpy; and
TOC	1.13 tpy.

2.b All new stationary carbon monoxide emission sources shall minimize carbon monoxide emissions by use of the best available control techniques and operating practices in accordance with best current technology.

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

B. Operational Restrictions

1. The permittee shall use only gasoline or diesel fuel in the test engines.

2. The total combined maximum gasoline usage for emissions units P001, P002, P003 and P004 shall not exceed 39,000 gallons per rolling, 12-month summation of gasoline usage.

   To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the gasoline usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

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Month	Maximum Allowable Cumulative Gasoline Consumption (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	39,000
1-5	39,000
1-6	39,000
1-7	39,000
1-8	39,000
1-9	39,000
1-10	39,000
1-11	39,000
1-12	39,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined gasoline consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined gasoline consumption.

3. The total combined maximum diesel fuel usage for emissions units P001, P002, P003 and P004 shall not exceed 46,000 gallons per rolling 12-month summation of diesel fuel usage.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the diesel fuel usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

Month	Maximum Allowable Cumulative Diesel Consumption (gallons)
1	15,350
1-2	30,700
1-3	46,000
1-4	46,000
1-5	46,000
1-6	46,000
1-7	46,000
1-8	46,000
1-9	46,000
1-10	46,000
1-11	46,000
1-12	46,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined diesel fuel consumption

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limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined diesel fuel consumption.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information:

   a. the daily gasoline usage for this emissions unit (gallons);
   b. the daily diesel fuel usage for this emissions unit (gallons);
   c. the monthly gasoline usage for this emissions unit (gallons);
   d. the monthly diesel fuel usage for this emissions unit (gallons); and
   e. beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the monthly gasoline and diesel fuel usage for this emissions unit (gallons).

   Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gasoline and diesel fuel usage for each calendar month (gallons).

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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3. For each day during which the permittee burns a fuel other than gasoline or diesel fuel the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the gallons of gasoline or diesel fuel consumed; 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 gallons of gasoline or diesel fuel consumed. These reports shall be submitted to the Cleveland Division of Air Quality (DAQ) in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month periods.

3. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than gasoline or diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

   a. **Emission Limitation:**
   Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

   Applicable Compliance Method:
   If required, compliance with the above visible emission limitation shall be determined through performance testing using Method 9 of 40 CFR, Part 60, Appendix A.

   b. **Emission Limitation**:
   1.73 lbs/hr of NOx emissions when burning gasoline
   15.10 lbs/hr of NOx emissions when burning diesel fuel

   Applicable Compliance Method:

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If required, compliance shall be determined by performing a stack test using Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

c. **Emission Limitation**:
66.98 lbs/hr of CO emissions when burning gasoline
3.25 lbs/hr of CO emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 10 of 40 CFR Part 60, Appendix A.

d. **Emission Limitation**:
0.09 lb/hr of SO_2 emissions when burning gasoline
0.99 lb/hr of SO_2 emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 6 of 40 CFR Part 60, Appendix A.

e. **Emissions Limitation:**
0.11 lb/hr of PM/PM_{10} emissions when burning gasoline
1.06 lbs/hr of PM/PM_{10} emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 5 of 40 CFR Part 60, Appendix A.

f. **Emissions Limitation:**
2.25 lbs/hr of VOC emissions when burning gasoline
1.23 lbs/hr of OC emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 25 of 40 CFR Part 60, Appendix A.

g. **Emission Limitation:**
When burning gasoline:
1.99 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
76.83 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.10 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;

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0.13 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
2.89 tpy of VOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable gasoline usage of 39,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly gasoline consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 39,000 gallons of gasoline consumed annually.

h. **Emission Limitation:**
When burning diesel fuel:
13.89 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
2.99 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.91 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;
0.98 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
1.13 tpy of TOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable diesel fuel usage of 46,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly diesel fuel consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 46,000 gallons of diesel fuel consumed annually.

F. Miscellaneous Requirements

1. The following terms and conditions in Part II are federally enforceable: A, B, C, D, and E.

2. Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain

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a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P002) - Engine Dynamometer test cell No. 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3) (Installed in January 2003)	From burning gasoline NOx emissions shall not exceed 1.73 lbs/hour CO emissions shall not exceed 66.98 lbs/hour SO_2 emissions shall not exceed 0.09 lb/hour PM/PM_{10} emissions shall not exceed 0.11 lb/hour VOC emissions shall not exceed 2.52 lbs/hour From burning diesel NOx emissions shall not exceed 15.10 lbs/hour CO emissions shall not exceed 3.25 lbs/hour SO_2 emissions shall not exceed 0.99 lbs/hour PM/PM_{10} emissions shall not exceed 1.06 lbs/hour OC emissions shall not exceed 1.23 lbs/hour
OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is equivalent to or less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See term and condition A.2.b
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V, Nonattainment New Source Review and Prevention of Significant Deterioration.	See term and condition A.2.a

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2. Additional Terms and Conditions

2.a The total, combined mass emissions from burning gasoline from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	1.99 tons/year (tpy);
CO	76.83 tpy;
SO2	0.10 tpy;
PM/PM_{10}	0.13 tpy; and
VOC	2.89 tpy.

The total, combined mass emissions from burning diesel fuel from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	13.89 tpy;
CO	2.99 tpy;
SO2	0.91 tpy;
PM/PM_{10}	0.98 tpy; and
TOC	1.13 tpy.

2.b All new stationary carbon monoxide emission sources shall minimize carbon monoxide emissions by use of the best available control techniques and operating practices in accordance with best current technology.

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

B. Operational Restrictions

1. The permittee shall use only gasoline or diesel fuel in the test engines.

2. The total combined maximum gasoline usage for emissions units P001, P002, P003 and P004 shall not exceed 39,000 gallons per rolling, 12-month summation of gasoline usage.

   To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the gasoline usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

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Month	Maximum Allowable Cumulative Gasoline Consumption (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	39,000
1-5	39,000
1-6	39,000
1-7	39,000
1-8	39,000
1-9	39,000
1-10	39,000
1-11	39,000
1-12	39,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined gasoline consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined gasoline consumption.

3. The total combined maximum diesel fuel usage for emissions units P001, P002, P003 and P004 shall not exceed 46,000 gallons per rolling 12-month summation of diesel fuel usage.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the diesel fuel usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

Month	Maximum Allowable Cumulative Diesel Consumption (gallons)
1	15,350
1-2	30,700
1-3	46,000
1-4	46,000
1-5	46,000
1-6	46,000
1-7	46,000
1-8	46,000
1-9	46,000
1-10	46,000
1-11	46,000
1-12	46,000

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined diesel fuel consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined diesel fuel consumption.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information:

   a. the daily gasoline usage for this emissions unit (gallons);
   b. the daily diesel fuel usage for this emissions unit (gallons);
   c. the monthly gasoline usage for this emissions unit (gallons);
   d. the monthly diesel fuel usage for this emissions unit (gallons); and
   e. beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the monthly gasoline and diesel fuel usage for this emissions unit (gallons).

   Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gasoline and diesel fuel usage for each calendar month (gallons).

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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3. For each day during which the permittee burns a fuel other than gasoline or diesel fuel the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the gallons of gasoline or diesel fuel consumed; 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 gallons of gasoline or diesel fuel consumed. These reports shall be submitted to the Cleveland Division of Air Quality (DAQ) in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month periods.

3. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than gasoline or diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

   a. **Emission Limitation:**
   Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

   Applicable Compliance Method:
   If required, compliance with the above visible emission limitation shall be determined through performance testing using Method 9 of 40 CFR, Part 60, Appendix A.

   b. **Emission Limitation:**
   1.73 lbs/hr of NOx emissions when burning gasoline
   15.10 lbs/hr of NOx emissions when burning diesel fuel

   Applicable Compliance Method:

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If required, compliance shall be determined by performing a stack test using Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

c. **Emission Limitation:**
66.98 lbs/hr of CO emissions when burning gasoline
3.25 lbs/hr of CO emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 10 of 40 CFR Part 60, Appendix A.

d. **Emission Limitation:**
0.09 lb/hr of SO_2 emissions when burning gasoline
0.99 lb/hr of SO_2 emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 6 of 40 CFR Part 60, Appendix A.

e. **Emissions Limitation:**
0.11 lb/hr of PM/PM_{10} emissions when burning gasoline
1.06 lbs/hr of PM/PM_{10} emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 5 of 40 CFR Part 60, Appendix A.

f. **Emissions Limitation:**
2.25 lbs/hr of VOC emissions when burning gasoline
1.23 lbs/hr of OC emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 25 of 40 CFR Part 60, Appendix A.

g. **Emission Limitation:**
When burning gasoline:
1.99 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
76.83 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.10 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;

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0.13 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
2.89 tpy of VOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable gasoline usage of 39,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly gasoline consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 39,000 gallons of gasoline consumed annually.

h. Emission Limitation:
When burning diesel fuel:
13.89 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
2.99 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.91 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;
0.98 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
1.13 tpy of TOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable diesel fuel usage of 46,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly diesel fuel consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 46,000 gallons of diesel fuel consumed annually.

F. Miscellaneous Requirements

1. The following terms and conditions in Part II are federally enforceable: A, B, C, D, and E.

2. Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain

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a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P003) - Engine Dynamometer test cell No. 3

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3) (Installed in January 2003)	From burning gasoline NOx emissions shall not exceed 1.73 lbs/hour CO emissions shall not exceed 66.98 lbs/hour SO_2 emissions shall not exceed 0.09 lb/hour PM/PM_{10} emissions shall not exceed 0.11 lb/hour VOC emissions shall not exceed 2.52 lbs/hour From burning diesel NOx emissions shall not exceed 15.10 lbs/hour CO emissions shall not exceed 3.25 lbs/hour SO_2 emissions shall not exceed 0.99 lbs/hour PM/PM_{10} emissions shall not exceed 1.06 lbs/hour OC emissions shall not exceed 1.23 lbs/hour
OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is equivalent to or less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See term and condition A.2.b
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V, Nonattainment New Source Review and Prevention of Significant Deterioration.	See term and condition A.2.a

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2. Additional Terms and Conditions

2.a The total, combined mass emissions from burning gasoline from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	1.99 tons/year (tpy);
CO	76.83 tpy;
SO2	0.10 tpy;
PM/PM_{10}	0.13 tpy; and
VOC	2.89 tpy.

The total, combined mass emissions from burning diesel fuel from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	13.89 tpy;
CO	2.99 tpy;
SO2	0.91 tpy;
PM/PM_{10}	0.98 tpy; and
TOC	1.13 tpy.

2.b All new stationary carbon monoxide emission sources shall minimize carbon monoxide emissions by use of the best available control techniques and operating practices in accordance with best current technology.

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

B. Operational Restrictions

1. The permittee shall use only gasoline or diesel fuel in the test engines.

2. The total combined maximum gasoline usage for emissions units P001, P002, P003 and P004 shall not exceed 39,000 gallons per rolling, 12-month summation of gasoline usage.

   To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the gasoline usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

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Month	Maximum Allowable Cumulative Gasoline Consumption (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	39,000
1-5	39,000
1-6	39,000
1-7	39,000
1-8	39,000
1-9	39,000
1-10	39,000
1-11	39,000
1-12	39,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined gasoline consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined gasoline consumption.

3. The total combined maximum diesel fuel usage for emissions units P001, P002, P003 and P004 shall not exceed 46,000 gallons per rolling 12-month summation of diesel fuel usage.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the diesel fuel usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

Month	Maximum Allowable Cumulative Diesel Consumption (gallons)
1	15,350
1-2	30,700
1-3	46,000
1-4	46,000
1-5	46,000
1-6	46,000
1-7	46,000
1-8	46,000
1-9	46,000
1-10	46,000
1-11	46,000

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1-12	46,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined diesel fuel consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined diesel fuel consumption.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information:

   a. the daily gasoline usage for this emissions unit (gallons);
   b. the daily diesel fuel usage for this emissions unit (gallons);
   c. the monthly gasoline usage for this emissions unit (gallons);
   d. the monthly diesel fuel usage for this emissions unit (gallons); and
   e. beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the monthly gasoline and diesel fuel usage for this emissions unit (gallons).

   Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gasoline and diesel fuel usage for each calendar month (gallons).

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

3. For each day during which the permittee burns a fuel other than gasoline or diesel fuel the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the gallons of gasoline or diesel fuel consumed; 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 gallons of gasoline or diesel fuel consumed. These reports shall be submitted to the Cleveland Division of Air Quality (DAQ) in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month periods.

3. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than gasoline or diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

   a. **Emission Limitation**:
   Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

   Applicable Compliance Method:
   If required, compliance with the above visible emission limitation shall be determined through performance testing using Method 9 of 40 CFR, Part 60, Appendix A.

   b. **Emission Limitation**:
   1.73 lbs/hr of NOx emissions when burning gasoline
   15.10 lbs/hr of NOx emissions when burning diesel fuel

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Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

c. **Emission Limitation**:
66.98 lbs/hr of CO emissions when burning gasoline
3.25 lbs/hr of CO emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 10 of 40 CFR Part 60, Appendix A.

d. **Emission Limitation**:
0.09 lb/hr of SO_2 emissions when burning gasoline
0.99 lb/hr of SO_2 emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 6 of 40 CFR Part 60, Appendix A.

e. **Emissions Limitation:**
0.11 lb/hr of PM/PM_{10} emissions when burning gasoline
1.06 lbs/hr of PM/PM_{10} emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 5 of 40 CFR Part 60, Appendix A.

f. **Emissions Limitation**:
2.25 lbs/hr of VOC emissions when burning gasoline
1.23 lbs/hr of OC emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 25 of 40 CFR Part 60, Appendix A.

g. **Emission Limitation:**
When burning gasoline:
1.99 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
76.83 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.10 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;

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0.13 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
2.89 tpy of VOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable gasoline usage of 39,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly gasoline consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 39,000 gallons of gasoline consumed annually.

h. **Emission Limitation:**
When burning diesel fuel:
13.89 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
2.99 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.91 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;
0.98 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
1.13 tpy of TOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable diesel fuel usage of 46,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly diesel fuel consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 46,000 gallons of diesel fuel consumed annually.

F. Miscellaneous Requirements

1. The following terms and conditions in Part II are federally enforceable: A, B, C, D, and E.

2. Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain

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a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P004) - Engine Dynamometer test cell No. 4

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3) (Installed in January 2003)	From burning gasoline NOx emissions shall not exceed 1.73 lbs/hour CO emissions shall not exceed 66.98 lbs/hour SO_2 emissions shall not exceed 0.09 lb/hour PM/PM_{10} emissions shall not exceed 0.11 lb/hour VOC emissions shall not exceed 2.52 lbs/hour From burning diesel NOx emissions shall not exceed 15.10 lbs/hour CO emissions shall not exceed 3.25 lbs/hour SO_2 emissions shall not exceed 0.99 lbs/hour PM/PM_{10} emissions shall not exceed 1.06 lbs/hour OC emissions shall not exceed 1.23 lbs/hour
OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-11(B)(5)	The emission limitation specified by this rule is equivalent to or less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See term and condition A.2.b
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V, Nonattainment New Source Review and Prevention of Significant Deterioration.	See term and condition A.2.a

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2. Additional Terms and Conditions

2.a The total, combined mass emissions from burning gasoline from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	1.99 tons/year (tpy);
CO	76.83 tpy;
SO2	0.10 tpy;
PM/PM_{10}	0.13 tpy; and
VOC	2.89 tpy.

The total, combined mass emissions from burning diesel fuel from emissions units P001, P002, P003 and P004, as a 12-month rolling summation, shall not exceed the following:

NOx	13.89 tpy;
CO	2.99 tpy;
SO2	0.91 tpy;
PM/PM_{10}	0.98 tpy; and
TOC	1.13 tpy.

2.b All new stationary carbon monoxide emission sources shall minimize carbon monoxide emissions by use of the best available control techniques and operating practices in accordance with best current technology.

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

B. Operational Restrictions

1. The permittee shall use only gasoline or diesel fuel in the test engines.

2. The total combined maximum gasoline usage for emissions units P001, P002, P003 and P004 shall not exceed 39,000 gallons per rolling, 12-month summation of gasoline usage.

   To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the gasoline usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

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Month	Maximum Allowable Cumulative Gasoline Consumption (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	39,000
1-5	39,000
1-6	39,000
1-7	39,000
1-8	39,000
1-9	39,000
1-10	39,000
1-11	39,000
1-12	39,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined gasoline consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined gasoline consumption.

3. The total combined maximum diesel fuel usage for emissions units P001, P002, P003 and P004 shall not exceed 46,000 gallons per rolling 12-month summation of diesel fuel usage.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the diesel fuel usage levels from emissions units P001, P002, P003 and P004 specified in the following table:

Month	Maximum Allowable Cumulative Diesel Consumption (gallons)
1	15,350
1-2	30,700
1-3	46,000
1-4	46,000
1-5	46,000
1-6	46,000
1-7	46,000
1-8	46,000
1-9	46,000
1-10	46,000
1-11	46,000
1-12	46,000

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After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual total combined diesel fuel consumption limitation for emissions units P001, P002, P003 and P004 shall be based upon a rolling, 12-month summation of the total combined diesel fuel consumption.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information:

   a. the daily gasoline usage for this emissions unit (gallons);
   b. the daily diesel fuel usage for this emissions unit (gallons);
   c. the monthly gasoline usage for this emissions unit (gallons);
   d. the monthly diesel fuel usage for this emissions unit (gallons); and
   e. beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the monthly gasoline and diesel fuel usage for this emissions unit (gallons).

   Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative gasoline and diesel fuel usage for each calendar month (gallons).

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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

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

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3. For each day during which the permittee burns a fuel other than gasoline or diesel fuel the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation on the gallons of gasoline or diesel fuel consumed; 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 gallons of gasoline or diesel fuel consumed. These reports shall be submitted to the Cleveland Division of Air Quality (DAQ) in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland DAQ by January 31 and July 31 of each year and shall cover the previous six-month periods.

3. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify each day when a fuel other than gasoline or diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

   a. **Emission Limitation:**
   Visible particulate emissions shall not exceed twenty percent opacity, as a six-minute average, except as provided by rule.

   Applicable Compliance Method:
   If required, compliance with the above visible emission limitation shall be determined through performance testing using Method 9 of 40 CFR, Part 60, Appendix A.

   b. **Emission Limitation:**
   1.73 lbs/hr of NOx emissions when burning gasoline
   15.10 lbs/hr of NOx emissions when burning diesel fuel

   Applicable Compliance Method:

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If required, compliance shall be determined by performing a stack test using Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

c. **Emission Limitation:**
66.98 lbs/hr of CO emissions when burning gasoline
3.25 lbs/hr of CO emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 10 of 40 CFR Part 60, Appendix A.

d. **Emission Limitation:**
0.09 lb/hr of SO_2 emissions when burning gasoline
0.99 lb/hr of SO_2 emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 6 of 40 CFR Part 60, Appendix A.

e. **Emissions Limitation:**
0.11 lb/hr of PM/PM_{10} emissions when burning gasoline
1.06 lbs/hr of PM/PM_{10} emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 5 of 40 CFR Part 60, Appendix A.

f. **Emissions Limitation:**
2.25 lbs/hr of VOC emissions when burning gasoline
1.23 lbs/hr of OC emissions when burning diesel fuel

Applicable Compliance Method:
If required, compliance shall be determined by performing a stack test using Methods 1-4, and 25 of 40 CFR Part 60, Appendix A.

g. **Emission Limitation:**
When burning gasoline:
1.99 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
76.83 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.10 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;

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0.13 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
2.89 tpy of VOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable gasoline usage of 39,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly gasoline consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 39,000 gallons of gasoline consumed annually.

h. **Emission Limitation:**
When burning diesel fuel:
13.89 tpy of NOx emissions from units P001-P004 combined per rolling, 12-month period;
2.99 tpy of CO emissions from units P001-P004 combined per rolling, 12-month period;
0.91 tpy of SO_2 emissions from units P001-P004 combined per rolling, 12-month period;
0.98 tpy of PM/PM_{10} emissions from units P001-P004 combined per rolling, 12-month period; and
1.13 tpy of TOC emissions from units P001-P004 combined per rolling, 12-month period.

Applicable Compliance Method:
The tpy limitations were developed using emission factors from U.S. EPA's Factor Information Retrieval Data System (FIRE) Version 6.24. The emission factor for each pollutant in lbs/1000 gallons was multiplied by the maximum allowable diesel fuel usage of 46,000 gallons per year and divided by 2,000 lbs per ton. Therefore, provided compliance is shown with the yearly diesel fuel consumption limitations, compliance will also be shown with the annual limitation as long as the permittee does not exceed 46,000 gallons of diesel fuel consumed annually.

F. Miscellaneous Requirements

1. The following terms and conditions in Part II are federally enforceable: A, B, C, D, and E.

2. Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain

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a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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TRW Automotive, LLC **Facility ID: 1318598662**
PTI Application: 13-04749
Issued: 6/12/2008

SIC CODE 8734 SCC CODE _____ EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Engine dynamometer test cell No. 1

DATE INSTALLED January 2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate (Each cell)	Tons Per Year (P001-P004 combined)	Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)
Particulate Matter	Attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.13 TPY gas 0.98 TPY diesel
PM_{10}	Non-attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel
Sulfur Dioxide	Attainment	0.05 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.88 TPY diesel	0.09 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.91 TPY diesel
Organic Compounds	Non-attainment	1.26 lbs/hr gasoline 1.23 lbs/hr diesel	2.84 TPY gas 1.10 TPY diesel	2.52 lbs/hr gas 1.23 lbs/hr diesel	2.89 TPY gas 1.13 TPY diesel
Nitrogen Oxides	Attainment	0.87 lb/hr gasoline 15.1 lbs/hr diesel	1.96 TPY gas 13.49 TPY diesel	1.73 lbs/hr gas 15.1 lbs/hr diesel	1.99 TPY gas 13.89 TPY diesel
Carbon Monoxide	Attainment	33.49 lbs/hr gasoline 3.25 lbs/hr diesel	75.62 TPY gas 2.90 TPY diesel	66.98 lbs/hr gas 3.25 lbs/hr diesel	76.83 TPY gas 2.99 TPY diesel
Lead	Attainment	N/A	N/A	N/A	N/A
Other: Air Toxics		N/A	N/A	N/A	N/A

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT was based on similar sources and OAC rules.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

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TRW Automotive, LLC **Facility ID: 1318598662**
PTI Application: 13-04749
Issued: 6/12/2008

SIC CODE 8734 SCC CODE _____ EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Engine dynamometer test cell No. 2

DATE INSTALLED January 2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)	Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)
Particulate Matter	Attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.13 TPY gas 0.98 TPY diesel
PM_{10}	Non-attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel
Sulfur Dioxide	Attainment	0.05 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.88 TPY diesel	0.09 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.91 TPY diesel
Organic Compounds	Non-attainment	1.26 lbs/hr gasoline 1.23 lbs/hr diesel	2.84 TPY gas 1.10 TPY diesel	2.52 lbs/hr gas 1.23 lbs/hr diesel	2.89 TPY gas 1.13 TPY diesel
Nitrogen Oxides	Attainment	0.87 lb/hr gasoline 15.1 lbs/hr diesel	1.96 TPY gas 13.49 TPY diesel	1.73 lbs/hr gas 15.1 lbs/hr diesel	1.99 TPY gas 13.89 TPY diesel
Carbon Monoxide	Attainment	33.49 lbs/hr gasoline 3.25 lbs/hr diesel	75.62 TPY gas 2.90 TPY diesel	66.98 lbs/hr gas 3.25 lbs/hr diesel	76.83 TPY gas 2.99 TPY diesel
Lead	Attainment	N/A	N/A	N/A	N/A
Other: Air Toxics		N/A	N/A	N/A	N/A

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT was based on similar sources and OAC rules.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

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TRW Automotive, LLC **Facility ID: 1318598662**
PTI Application: 13-04749
Issued: 6/12/2008

SIC CODE 8734 SCC CODE _____ EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION Engine dynamometer test cell No. 3

DATE INSTALLED January 2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)	Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)
Particulate Matter	Attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.13 TPY gas 0.98 TPY diesel
PM_{10}	Non-attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel
Sulfur Dioxide	Attainment	0.05 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.88 TPY diesel	0.09 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.91 TPY diesel
Organic Compounds	Non-attainment	1.26 lbs/hr gasoline 1.23 lbs/hr diesel	2.84 TPY gas 1.10 TPY diesel	2.52 lbs/hr gas 1.23 lbs/hr diesel	2.89 TPY gas 1.13 TPY diesel
Nitrogen Oxides	Attainment	0.87 lb/hr gasoline 15.1 lbs/hr diesel	1.96 TPY gas 13.49 TPY diesel	1.73 lbs/hr gas 15.1 lbs/hr diesel	1.99 TPY gas 13.89 TPY diesel
Carbon Monoxide	Attainment	33.49 lbs/hr gasoline 3.25 lbs/hr diesel	75.62 TPY gas 2.90 TPY diesel	66.98 lbs/hr gas 3.25 lbs/hr diesel	76.83 TPY gas 2.99 TPY diesel
Lead	Attainment	N/A	N/A	N/A	N/A
Other: Air Toxics		N/A	N/A	N/A	N/A

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT was based on similar sources and OAC rules.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

TRW Automotive, LLC **Facility ID: 1318598662**
PTI Application: 13-04749
Issued: 6/12/2008

SIC CODE 8734 SCC CODE EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION Engine dynamometer test cell No. 4

DATE INSTALLED January 2003

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)	Short Term Rate (each cell)	Tons Per Year (P001-P004 combined)
Particulate Matter	Attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.13 TPY gas 0.98 TPY diesel
PM_{10}	Non-attainment	0.05 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel	0.11 lb/hr gasoline 1.06 lbs/hr diesel	0.12 TPY gas 0.95 TPY diesel
Sulfur Dioxide	Attainment	0.05 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.88 TPY diesel	0.09 lb/hr gasoline 0.99 lb/hr diesel	0.10 TPY gas 0.91 TPY diesel
Organic Compounds	Non-attainment	1.26 lbs/hr gasoline 1.23 lbs/hr diesel	2.84 TPY gas 1.10 TPY diesel	2.52 lbs/hr gas 1.23 lbs/hr diesel	2.89 TPY gas 1.13 TPY diesel
Nitrogen Oxides	Attainment	0.87 lb/hr gasoline 15.1 lbs/hr diesel	1.96 TPY gas 13.49 TPY diesel	1.73 lbs/hr gas 15.1 lbs/hr diesel	1.99 TPY gas 13.89 TPY diesel
Carbon Monoxide	Attainment	33.49 lbs/hr gasoline 3.25 lbs/hr diesel	75.62 TPY gas 2.90 TPY diesel	66.98 lbs/hr gas 3.25 lbs/hr diesel	76.83 TPY gas 2.99 TPY diesel
Lead	Attainment	N/A	N/A	N/A	N/A
Other: Air Toxics		N/A	N/A	N/A	N/A

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT was based on similar sources and OAC rules.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: N/A

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