Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/6/2012

Certified Mail

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

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448010414
Permit Number: P0109583
Permit Type: OAC Chapter 3745-31 Modification
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

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. In April of 2011, Chrysler requested a modification of PTI 04-01102, for emissions units P008, 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 this project were identified as P0108007, P0108040 and P0108063. This project also included the installation of additional makeup air heaters which were exempted from permitting requirements, an emergency generator which was issued as a PBR, and facility-wide increased VOC emissions associated with the projected production rate increase; all of which were included with the total project emissions for purposes of PSD review. As issued in April, the increase in emissions from this project did not exceed PSD significance levels and was therefore not subject to PSD review.

   In February of 2012, Chrysler informed our office that minor increases were required to the permitted burner capacities to reflect the actual capacities to be installed:

| | Permitted (mmBtu/hr) | Installed (mmBtu/hr) |
|---|---|---|
| K021 | 4.0 | 9.0 |
| K022 | 4.0 | 6.0 |
| K023 | 4.0 | 6.0 |
| P008 | 10.0 | 12.0 |

   Additionally, for the natural gas-fired space heaters, air make-up units sealer gel oven, and the heater boxes associated with the oven extensions the total rated heat input was raised from 80.0 to 81.3 mmBtu/hr. By this action the associated emissions will be re-evaluated and the PSD review modified to reflect the addition of the additional burner capacity.

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:

| Actual emissions, in tons per year | CO | $NO_X$ | $PM_{10}$ | $SO_2$ | VOC |
|---|---|---|---|---|---|
| | 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:

Permit allowable annual emissions in tons:

P0108040 as issued 7/21/11;

| | CO | NOx | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| P008* | 3.64 | 4.38 | 0.08 | 0.33 | 0.33 | 0.03 | 77.73 |
| K021 | 10.91 | 13.14 | 0.24 | 0.99 | 0.99 | 0.08 | 52.72 |
| K022 | 14.47 | 17.43 | 0.33 | 1.31 | 1.31 | 0.10 | 4.19 |
| K023 | 17.60 | 21.20 | 0.40 | 68.49 | 1.59 | 0.13 | 769.83 |

February 2012 revised permit allowables;

| | CO | NOx | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| P008* | 4.37 | 5.26 | 0.10 | 0.40 | 0.40 | 0.04 | 77.78 |
| K021 | 12.73 | 15.33 | 0.30 | 1.15 | 1.15 | 0.10 | 52.84 |
| K022 | 15.20 | 18.31 | 0.35 | 1.38 | 1.38 | 0.11 | 4.24 |
| K023 | 18.33 | 22.08 | 0.42 | 68.56 | 1.66 | 0.14 | 769.88 |

* P008 includes a 4 mmBtu/hr incinerator whose 0.10 tons of VOC per year emissions are included in the PSD determination, but are not included in the permit allowables.

The entire project is expected to result in a revised increase in actual to future projected actual VOC emissions of 39.03 tons per year.

5. Conclusion:

Issuance of this permit will not involve PSD review and the modification of the existing permit meets the applicable requirements for permit issuance. The permit should be issued as a draft/final as the facility is Title V and require federal enforceability of the terms and conditions.

6. Please provide additional notes or comments as necessary:

   See notes below.

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

| Pollutant | Tons Per Year | increase |
|---|---|---|
| CO | 50.63 | 12.03 |
| NOx | 60.98 | 14.58 |
| PE | 1.17 | 1.17 |
| $PM_{10}$ | 71.49 | 2.56 |
| $PM_{2.5}$ | 4.59 | 4.59 |
| $SO_2$ | 0.39 | 0.11 |
| VOC | 904.74 | 23.42 |

PSD applicability

Chrysler owns and operates automobile manufacturing plants in Toledo, Ohio. The Toledo North Assembly Plant (TNAP) is a full scale automotive assembly plant located adjacent to the Toledo Supplier Park facility complex. Two plants (TNAP and TSP) operate under one premise number as 0448010414. Three operationally linked facilities operate under separate premise numbers as 0448011729, 0448011730 and 0448011731. For PSD purposes these separate sources are considered to be one facility with a combined potential to emit greater than major source status for NOx, VOC and HAPs based on the reported PTE in the latest Title V permit applications.

| | CO | NOx | $PM_{10}$ | $SO_2$ | VOC | Single HAP | Combined HAPs |
|---|---|---|---|---|---|---|---|
| 0448010414 | 137.77 | 322.49 | 108.40 | 2.17 | 1635.65 | 216.8 | 612.1 |
| 0448011729 | 3.36 | 3.36 | 0.3 | 0.03 | 6.02 | - | - |
| 0448011730 | - | - | 5 | - | 12 | - | - |
| 0448011731 | 68.9 | 61.45 | 6.52 | 7.85 | 297.83 | - | - |
| PTE | 210 | 387 | 120 | 10 | 1952 | 217 | 612 |
| Major status | 250 | 250 | 250 | 250 | 250 | 10 | 25 |

Chrysler submitted a Technical Support Document with their permit application which included calculations of the actual TNAP facility wide emissions increases for PSD purposes (actual to projected future actual, or actual to potential). Our confirming calculations are summarized as follows (differences are thought to have occurred due to rounding error and the use of 1000 mmBtu/hrvs 1020 mmBtu/hr for the heat content of natural gas):

| | CO | $NO_X$ | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC[4] |
|---|---|---|---|---|---|---|---|
| K021 (burner) | 3.28 | 3.94 | 0.08 | 0.30 | 0.30 | 0.03 | 0.21 |
| K022 (burner) | 2.19 | 2.63 | 0.05 | 0.20 | 0.20 | 0.02 | 0.15 |
| K023 (burner) | 2.19 | 2.63 | 0.05 | 0.20 | 0.20 | 0.02 | 0.15 |
| P008 | 5.82 | 7.01 | 0.13 | 0.53 | 0.53 | 0.05 | 34.86[2] |
| P012 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| P014 | 0 | 0 | 0 | 0 | 0 | 0 | 8.67 |
| ASH | 2.91 | 3.51 | 0.07 | 0.27 | 0.27 | 0.03 | 0.19 |
| MAH | 13.20 | 15.90 | 0.31 | 1.20 | 1.20 | 0.10 | 0.86 |
| Gen | 0.02 | 2.04 | 0.01 | 0.01 | 0.01 | 0.01 | 0.06 |
| K021 | 0 | 0 | 0 | 0 | 0 | 0 | 0.50 |
| K022 | 0 | 0 | 0 | 0 | 0 | 0 | 0.22 |
| K023 | 0 | 0 | 0 | 0 | 0 | 0 | 37.81 |
| P007 | 0 | 0 | 0 | 0 | 0 | 0 | 26.74 |
| P009 | 0 | 0 | 0 | 0 | 0 | 0 | 5.81 |
| P010 | 0 | 0 | 0 | 0 | 0 | 0 | 0.14 |
| Increase | 29.61 | 37.66 | 0.70 | 2.71 | 2.71 | 0.26 | 116.37 |
| Minus[1] | - | - | - | - | - | - | 77.34[3] |
| Adj. Increase | 30 | 38 | 1 | 3 | 3 | 1 | 39.03 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Significance | 100 | 40 | 40 | 25 | 15 | 10 | 40 |

1. ***Minus excludable portion due to product demand.***
2. ***Our review establishes the maximum actual to projected future actual VOC emissions increase in P008 to be 34.86 VOC tpy which is comprised of an increase of 0.29 tpy PTE from the installation of new oven burners, and 0.10 tpy PTE from the installation of new incinerator burners and 34.47 tpy related to the increase in coating usage and in the operation to the existing burners associated with this emissions unit.***
3. ***Chrysler's analysis of the excludable portion was based on reported emissions of 503.78 tons of VOC for 2002 and 446.19 for 2003 for an average related emissions rate of 474.99 tons per year at an average production rate of 280,689 vehicles per year which equates to 3.38 pounds of VOC per vehicle. Chrysler demonstrated an excludable level of production of 46,311 vehicles which equates to excludable emissions of 78.27 tons. Our review based on the emissions fee reports of 2002 and 2003 and additional comments from Chrysler, suggest that the emissions attributed to the boilers (1.70 tpy average) and to the emissions units located at the Stickney Ave plant (3.04 tpy average) should be excluded from the analysis, for an average related emissions rate of 468.54 tons per year and 3.34 pounds of VOC per vehicle. At the Chrysler demonstrated excludable level of production of 46,311 vehicles this equates to excludable emissions of 77.34 tons.***
4. ***The emissions for the makeup air heaters, generator, the burner emissions of K021, K022, K023, P008, P012 and P014 represent past actual to future PTE increases. The increases in the emissions of P007, P009, P010 and coating emissions of K021, K022 and K023, we calculated as the increase in an average of the 2002 and 2003 reported emissions raised by the projected production rate from 280,689 to 327,000 vehicles per year as follows:***

| | K021 | K022 | K023 | P007 | P008 | P009 | P010 |
|---|---|---|---|---|---|---|---|
| 2002 | 2.37 | 1.29 | 226.55 | 184.56 | 38.18 | 44.94 | 1.27 |
| 2003 | 3.67 | 1.41 | 231.77 | 139.52 | 38.92 | 25.55 | 0.43 |
| average | 3.02 | 1.35 | 229.16 | 162.04 | 38.55 | 35.24 | 0.85 |
| projected actual | 3.52 | 1.57 | 266.97 | 188.78 | 44.92* | 41.05 | 0.99 |
| increase | 0.50 | 0.22 | 37.81 | 26.74 | 6.37* | 5.81 | 0.14 |

**** Chrysler requested a higher level of projected future actual emissions to allow the maximum operational flexibility in the usage of new material.***

5. ***The burner heat input increases by this PTI are as follows: K021 – 9 mmBtu/hr; K022– 6 mmBtu/hr; K023 – 6 mmBtu/hr; P008 – 12 mmBtu/hr for the oven and 4 mmBtu/hr for the incinerator; emissions for the makeup air heaters – 36.3 mmBtu/hr, and for the new (permit exempt) air supply house in the paint shop – 8 mmBtu/hr. This constitutes a combined increase of 81.3 mmBtu/hr with emissions calculated at AP-42 derived emissions factors of CO: 0.083 pound/mmBtu, NOx: 0.100 lb/mmBtu, PE: 0.0019 pound/mmBtu, PM10 and PM2.5: 0.0075 pound/mmBtu, SO2: 0.0006 pound/mmBtu and VOC: 0.0054 pound/mmBtu.***

At this level of emissions, PSD review will be avoided. In order to assure compliance with the projected future actual emissions of the PSD review performed in association with the changes required for the 2013 model year (i.e. changes to P008, P012, P014, K021,K022 and K023) the permittee will have to demonstrate that the projected future actual PSD limitations have not been exceeded. For enforceability OEPA developed standardized language to be included in the facility-wide section of this permit which will require a calculation of actual emissions annually.

OEPA requires this information to appear as a permit restriction in the Facility-wide permit as follows:

**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 | 0.39 | 0.39 |
| K021 new burners | 0 | 0.21 | 0.21 |
| K022 new burners | 0 | 0.15 | 0.15 |
| K023 new burners | 0 | 0.15 | 0.15 |
| P012 (Welding) | 0 | 0 | 0 |
| P014 (Purfoam) | 0 | 8.67 | 8.67 |
| Make up air heaters | 0 | 0.86 | 0.86 |
| Air supply house | 0 | 0.19 | 0.19 |
| New Emergency Generator (PBR) | 0 | 0.06 | 0.06 |
| **Emissions from Associated Units **** | 0 | 10.68 | 10.68 |
| K021[1] | 3.02 | 3.52 | 0.50 |
| K022[1] | 1.35 | 1.57 | 0.22 |
| K023[1] | 229.16 | 266.97 | 37.81 |
| P007 | 162.04 | 188.78 | 26.74 |
| P008 | 38.55 | 73.02[2] | 34.47 |

| | | | |
|---|---|---|---|
| P009 | 35.24 | 41.05 | 5.81 |
| P010 | 0.85 | 0.99 | 0.14 |
| **Subtotals** | 470.21 | 586.58 | 116.37 |
| **Excludable Emissions** | | | <77.34> |
| **Expansion Project Totals** | | | 39.03 |

[1] includes reported VOC emissions from the existing burners
[2] Chrysler requested increased future actual emissions to allow for operational flexibility in the usage of new sealant and adhesive materials

**E-Coat tank extension - K021**

The E-coat line is an electrodeposition process involving the total immersion of the vehicle body in a water based coating followed by drying in a natural gas, indirect fired oven with an incinerator. Oven burner capacity was anticipated to increase by the addition of two heater boxes, each with a rating of 2 mmBtu/hr for an increase of 4 mmBtu/hr in burner capacity. Oven burner capacity will increase by the addition of three heater boxes, each with a rating of 3 mmBtu/hr for an increase of 9 mmBtu/hr in burner capacity. This increase will result in an installed burner capacity of 35 mmBtu/hr for this emissions unit.

PTI P0108040 effective July 21, 2011 set BAT at CO: 0.083 pound/mmBtu& 10.91 tons/year, NOx: 0.100 lb/mmBtu& 13.14 tons/year, PE: 0.0019 pound/mmBtu and 0.24 ton/yr, PM10 and PM2.5: 0.0075 pound/mmBtu and 0.99 ton/year, SO2: 0.0006 pound/mmBtu and 0.08 ton/year, VOC: 0.0054 pound/mmBtu and 0.71 ton/year, as mandated by OAC rule 3745-31-05(A)(3) (as effective 11/30/01). In consideration of SB265 or OAC rule 3745-31-05(A)(3) (as effective 12/01/06) BAT was also be stated as CO: 0.083 pound/mmBtu and NOx: 0.100 lb/mmBtu after the SIP revision is accepted. At 35 mmBtu/hr and an operating schedule of 8760 hours per year:

| | CO | NOx | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC | |
|---|---|---|---|---|---|---|---|---|
| 04-1102 | 9.5 | 11.4 | - | | 0.064 | - | 0.068 | 0.62 |
| P0108040 | 10.91 | 13.14 | 0.24 | 0.99 | 0.99 | 0.08 | 0.71 | |
| Revision | 12.73 | 15.33 | 0.30 | 1.15 | 1.15 | 0.10 | 0.83 | |
| Revised Increase | 3.23 | 3.93 | 0.30 | 1.09 | 1.15 | 0.03 | 0.21 | |

**K022, Powder Anti-chip**

The anti-chip line is an electrodeposition process involving the powder coating of the vehicle body controlled by a fabric filter, followed by baking to cure in a natural gas, indirect fired oven with an incinerator.

Oven burner capacity was anticipated to increase by the addition of two heater boxes, each with a rating of 2 mmBtu/hr, for an increase of 4 mmBtu/hr of burner capacity. Oven burner capacity will actually increase by the addition of two heater boxes, each with a rating of 3 mmBtu/hr, for an increase to 6 mmBtu/hr burner capacity. Therefore this portion of the existing permit will be considered to be subject to a new OAC rule 3745-31-05 determination.

In PTI 04-1102 as issued 9/8/05 the requirements for the oven burners were revised to CO: 0.083 pound/mmBtu and 12.9 tons/year, NOx: 0.100 pound/mmBtu and 15.5 tons/year, PM10: 0.0056 pound/mmBtu and 0.87 ton/year, SO2: 0.0006 pound/mmBtu and 0.093 ton/year, VOC: 0.0054 pound/mmBtu and 0.84 ton/year and 5 percent opacity from the oven combustion gases based upon emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98 at 35.8 mmBtu per hour maximum burner capacity and 8760 hours per year operation.

PTI P0108040 effective July 21, 2011 set BAT at; CO: 0.083 pound/mmBtu& 14.47 tons/year, NOx: 0.100 lb/mmBtu& 17.43 tons/year, PE: 0.0019 pound/mmBtu and 0.33 ton/year, PM10 and PM2.5: 0.0075 pound/mmBtu and 1.31 tons/year, SO2: 0.0006 pound/mmBtu and 0.10 ton/year, VOC: 0.0054 pound/mmBtu and 0.94 ton/year, as mandated by OAC rule 3745-31-05(A)(3) (as effective 11/30/01) at 39.8 mmBtu per hour maximum burner capacity and 8760 hours per year operation. In consideration of SB265 or OAC rule 3745-31-05(A)(3) (as effective 12/01/06) BAT was also stated as CO: 0.083 pound/mmBtu and NOx: 0.100 lb/mmBtu after the SIP revision is accepted. At 41.8 mmBtu/hr and an operating schedule of 8760 hours per year:

| | CO | NOx | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| 04-1102 | 12.9 | 15.5 | - | 0.87 | - | 0.093 | 0.84 |
| P0108040 | 14.47 | 17.43 | 0.33 | 1.31 | 1.31 | 0.10 | 0.94 |
| Revision | 15.20 | 18.31 | 0.35 | 1.38 | 1.38 | 0.11 | 0.99 |
| Revised Increase | 2.30 | 2.81 | 0.35 | 0.51 | 1.38 | 0.02 | 0.15 |

**<u>Clearcoat material change – K023</u>**

The topcoat lines consists of automated and manual spray painting of a water based basecoat, infrared flash tunnel, automated and manual spray painting of a solvent based clearcoat and an indirect gas fired drying oven. The VOC emissions from the tunnels and ovens are controlled by thermal incineration.

Oven burner capacity was expected to increase by the addition of one 2 mmBtu/hr heater box to each existing oven, for an increase of 4 mmBtu/hr burner capacity. Oven burner capacity will increase to 6 mmBtu/hr.

PTI P0108040 effective July 21, 2011 set BAT at: CO: 0.083 pound/mmBtu& 17.60 tons/year, NOx: 0.100 lb/mmBtu& 21.20 tons/year, PE: 0.0019 pound/mmBtu and 0.40 ton/year, PM10 and PM2.5: 0.0075 pound/mmBtu and 1.59 tons/year, SO2: 0.0006 pound/mmBtu and 0.13 ton/year, VOC: 0.0054 pound/mmBtu and 1.15 tons/year, as mandated by OAC rule 3745-31-05(A)(3) (as effective 11/30/01). In consideration of SB265 or OAC rule 3745-31-05(A)(3) (as effective 12/01/06) BAT will also be stated as CO: 0.083 pound/mmBtu and NOx: 0.100 lb/mmBtu after the SIP revision is accepted. At 50.4 mmBtu/hr and an operating schedule of 8760 hours per year:

| | CO | NOx | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| 04-1102 | 16.2 | 19.5 | - | 1.1 | - | 0.12 | 1.1 |
| P0108040 | 17.60 | 21.20 | 0.40 | 1.59 | 1.59 | 0.13 | 1.15 |
| Revision | 18.33 | 22.08 | 0.42 | 1.66 | 1.66 | 0.14 | 1.20 |
| Revised Increase | 2.13 | 2.58 | 0.42 | 0.56 | 1.66 | 0.02 | 0.10 |

**P008 - Miscellaneous use of Sealers and Adhesives**

General Description – Chrysler identifies the miscellaneous use of various sealers and adhesives as a source of low level fugitive VOC emissions. Chrysler's sealer operations will be modified to improve underbody and hem flange corrosion protection for all vehicles manufactured at the facility, resulting in an increase in permit allowable VOC emissions. A new sealer gel oven, with a small thermal oxidizer, was also installed to speed curing the of the sealer materials to prevent dripping of sealer materials in the existing prime coating operations. Allowable combustion emissions were based on a 10 mmBtu/hr, natural gas, indirect fired gel oven, however this permit will revise the capacity to 12 mmBtu/hr.

PTI P0108040 effective July 21, 2011 set BAT at: CO: 0.083 pound/mmBtu& 3.64 tons/year, NOx: 0.100 lb/mmBtu& 4.38 tons/year, PE: 0.0019 pound/mmBtu and 0.08 ton/year, PM10 and PM2.5: 0.0075 pound/mmBtu and 0.33 ton/year, SO2: 0.0006 pound/mmBtu and 0.03 ton/year, VOC: 0.0054 pound/mmBtu and 0.24 ton/year, as mandated by OAC rule 3745-31-05(A)(3) (as effective 11/30/01). In consideration of SB265 or OAC rule 3745-31-05(A)(3) (as effective 12/01/06) BAT will also be stated with no restictions after the SIP revision is accepted. At 12.0 mmBtu/hr and an operating schedule of 8760 hours per year:

| | CO | NOx | PE | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| 04-1102 | - | - | - | - | - | - | - |
| P0108040 | 3.64 | 4.38 | 0.08 | 0.33 | 0.33 | 0.03 | 0.24 |
| Revision | 4.37 | 5.26 | 0.10 | 0.40 | 0.40 | 0.04 | 0.29 |
| Revised Increase | 4.37 | 5.26 | 0.10 | 0.40 | 0.40 | 0.04 | 0.29 |

**Natural gas-fired space heaters and air make-up units**

The anticipated total installed heat input rate was lowered from 54.0 to 36.3 mmBtu/hr.
At AP-42, Tables 1.4-1&2 CO emissions levels and 1020 Btu/cuft for natural gas combustion, this equates to a potential to emit of:

| | CO | NOx | PE | PM10 | PM2.5 | SO2 | VOC |
|---|---|---|---|---|---|---|---|
| P0108040 | 19.48 | 23.18 | 0.44 | 1.76 | 1.76 | 0.14 | 1.28 |
| Revision | 13.20 | 15.90 | 0.31 | 1.20 | 1.20 | 0.10 | 0.86 |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Increase | (6.28) | (7.28) | (0.09) | (0.56) | (0.56) | (0.04) | (0.42) |

**Natural gas-fired air supply house**

The company reported the addition of an 8 mmBtu/hr air supply house in the paint shop as a part of this modification, which will be exempted by OAC rule 3745-31-03 from the requirements to receive an operating permit. At AP-42, Tables 1.4-1&2 CO emissions levels and 1020 Btu/cuft for natural gas combustion, this equates to a potential to emit of:

| | CO | NOx | PE | PM10 | PM2.5 | SO2 | VOC |
|---|---|---|---|---|---|---|---|
| Revision | 2.91 | 3.51 | 0.07 | 0.27 | 0.27 | 0.03 | 0.19 |

PUBLIC NOTICE
3/6/2012 Issuance of Draft Air Pollution Permit-To-Install

Chrysler Group LLC - Toledo North Assembly
4400 Chrysler Drive,
Toledo, OH 43608-4000
Lucas County
FACILITY DESC.: Automobile Manufacturing
PERMIT #: P0109583
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: Modification to make minor permit allowable changes to revise the estimated burner capacity to match the installed burner size. These changes do not adversely affect the previous PSD status of the original PTI (P0108040).

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Danny Pittman, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015

Ohio | Environmental Protection Agency

# DRAFT

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

| | |
|---|---|
| Facility ID: | 0448010414 |
| Permit Number: | P0109583 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 3/6/2012 |
| Effective: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**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): M0001574
Permit Number: P0109583
Permit Description: Modification to make minor permit allowable changes to revise the estimated burner capacity to match the installed burner size. These changes do not adversely affect the previous PSD status of the original PTI (P0108040).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/6/2012
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: P0109583
Permit Description: Modification to make minor permit allowable changes to revise the estimated burner capacity to match the installed burner size. These changes do not adversely affect the previous PSD status of the original PTI (P0108040).

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

| | |
|---|---|
| **Emissions Unit ID:** | **K021** |
| Company Equipment ID: | E-Coat |
| Superseded Permit Number: | P0108040 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **K022** |
| Company Equipment ID: | Powder Anti-chip |
| Superseded Permit Number: | P0108040 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **K023** |
| Company Equipment ID: | Topcoat |
| Superseded Permit Number: | P0108040 |
| General Permit Category and Type: | Not Applicable |
| **Emissions Unit ID:** | **P008** |
| Company Equipment ID: | Sealers and Adhesives |
| Superseded Permit Number: | P0108040 |
| 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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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, andreportingrequirements 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 enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

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

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

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

**16. Fees**

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

**17. 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.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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

# 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 40 CFR Part 60, Subpart MM: K021, K022 and K023. The complete NSPS requirements, including the NSPS 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. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K021, K022, K023 and P008. 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.

4. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

   The following emissions units in this permit are subject to the aforementioned requirements: K021, K022, K023 and P008

5. 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

**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 | 0.39 | 0.39 |
| K021 new burners | 0 | 0.21 | 0.21 |
| K022 new burners | 0 | 0.15 | 0.15 |
| K023 new burners | 0 | 0.15 | 0.15 |
| P012 | 0 | 0 | 0 |
| P014 | 0 | 8.67 | 8.67 |
| Make up air heaters | 0 | 0.86 | 0.86 |
| Air supply house | 0 | 0.19 | 0.19 |
| New Emergency Generator (PBR) | 0 | 0.06 | 0.06 |
| **Emissions from Associated Units **** | 0 | 10.68 | 10.68 |
| 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 | 586.58 | 1126.37 |
| **Excludable Emissions** | | | <77.34> |

| | | | |
|---|---|---|---|
| **Expansion Project Totals** | | | 39.03 |

# C. Emissions Unit Terms and Conditions

**1. K021, E-Coat**

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

E-coat with 35.0 mmBtu per hour indirect fired, natural gas drying oven

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

(1) g)(1)

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.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Electrodeposition (E-Coat) prime coat of automobile bodies with regenerative thermal oxidizer (RTO) on the oven exhaust | | |
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 04-1102 issued 10/27/99) | visible particulate emissions from the RTO stack shall not exceed 5% opacity as a 6-minute average<br><br>see b)(2)a. through b)(2)c. |
| b. | OAC rules 3745-31-10 through 20<br>(PTI 04-1102 issued 10/27/99) | emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 0.23 pound per gallon of applied coating solids as a monthly volume weighted average<br><br>emissions of VOC from this emissions unit shall not exceed 52.01 tons during any rolling, 12-month period |
| c. | OAC rule 3745-21-09(C)(1)(a)(ii) through (iv) | see b)(2)d. |
| d. | 40 CFR Part 60, Subpart A<br>(60.1 through 60.19) | see b)(2)e. |
| e. | 40 CFR Part 60, Subpart MM<br>(60.390 through 60.398)<br><br>In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant prime coat operation subject to the emission limitations/control measures specified in this section. | see b)(2)f. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| f. | 40 CFR Part 63, Subpart A<br>(63.1 through 63.16) | see b)(2)g. |
| g. | 40 CFR Part 63, Subpart IIII<br>(63.3080 through 63.3176)<br><br>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section. | see b)(2)h.<br><br>[63.3091(a) and (b)] |
| 35.0 mmBtu per hour indirect fired, natural gas drying oven combustion emissions | | |
| h. | OAC rule 3745-31-05(A)(3)<br>(as effective 11/30/01) | the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed:<br><br>0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input;<br>12.73 tons of CO per rolling, 12-month period;<br>0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input;<br>15.33tons of NOx per rolling, 12-month period;<br>0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input;<br>0.30 ton of PE per rolling, 12-month period;<br>0.0075 pound of particulate emissions of 10 microns or less in diameter (PM10) per mmBtu of actual heat input;<br>1.15 tons of PM10 per rolling, 12-month period;<br>0.0075 pound of particulate emissions of 2.5 microns or less in diameter (PM10) per mmBtu of actual heat input;<br>1.15 tons of PM2.5 per rolling, 12-month period;<br>0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input;<br>0.10 ton of SO2 per rolling, 12-month period;<br>0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input;<br>0.83 ton of VOC per rolling, 12-month period; and<br>5% opacity as a 6-minute average<br><br>see b)(2)i. and b)(2)j. |

| | | |
|---|---|---|
| i. | OAC rule 3745-31-05(A)(3)<br>(as effective 12/01/06) | the emissions from the oven combustion stack(s) shall not exceed:<br><br>0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and<br>0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.<br><br>see b)(2)i., and b)(2)k. |
| j. | OAC rule 3745-17-07(A)(1) | visible particulate emissions from this emissions unit shall not exceed 20 percent opacity as a six-minute average |
| k. | OAC rule 3745-17-10(B)(1) | particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input |
| l. | OAC rule 3745-18-06(A) | see b)(2)l. |
| m. | 40 CFR Part 63, Subpart A<br>(63.1 through 63.16) | see b)(2)m. |
| n. | 40 CFR Part 63, Subpart DDDDD<br>(63.7480 through 63.7575)<br><br>In accordance with 40 CFR 63.7485, this emissions unit is an process heater that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section. | Applicable Emission Limits in Tables 1 and 2; Work Practice Standards in Table 3 and Operating Limits in Table 4 to Subpart DDDDD of 40 CFR Part 63 (subject to change based on the issuance of the Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD by U.S. EPA).<br><br>See b)(2)n. |

(2) Additional Terms and Conditions

a. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations.

b. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

c. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart MM and 40 CFR Part 63, Subpart IIII.

d. The permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

i. 1.4 pounds of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio (RT) is 0.16 or greater.

ii. $1.4 \times 350^{(0.160-RT)}$ pounds of VOC per gallon of solids from any EDP coating line when RT is greater than or equal to 0.040 and less than 0.160; or

iii. when RT, is less than 0.040 for any EDP coating line, there is no emission limit;

where RT is calculated according to the equation in paragraph OAC rule 3745-21-09(C)(1)(a)(ii).

e. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

f. In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this emissions unit VOC emissions in excess of:

i. 0.17 kilogram of VOC per liter of applied coating solids when RT is 0.16 or greater.

ii. $0.17 \times 350^{(0.160-RT)}$ kg of VOC per liter of applied coating solids when RT is greater than or equal to 0.040 and less than 0.160.

iii. When RT is less than 0.040, there is no emission limit.

g. 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.

h. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not

components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

i. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

j. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

k. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO2), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

l. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore,

this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

m. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

n. The requirements of 40 CFR Part 63, Subpart DDDDD are currently effective due to the January 9, 2012 decision by the United States District Court for the District of Columbia to vacate the administrative stay that U.S. EPA put in place during the reconsideration of the March, 2011 final rules. On February 7, 2012, U.S. EPA issued a “No Action Assurance“ letter to facilities and indicated that U.S. EPA will exercise its enforcement discretion to not pursue enforcement action of violations of the Initial Notification deadlines established in the rule. This letter further notes that U.S. EPA has proposed revisions to the compliance dates for all units (the date by which a unit must be in compliance with the substantive requirements in the Boiler MACT rule) and to the subcategories for some units. U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012.

c) Operational Restrictions

(1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

(2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

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

(3) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the incinerator is in operation as a VOC control device for compliance purposes, shall not be below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

(4) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(5) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(6) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

d) Monitoring and/or Recordkeeping Requirements

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

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the firebox of the thermal incinerator when the incinerator is in operation. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications, with any modifications deemed necessary by the permittee and approved by the Toledo Division of Environmental Services. The device shall have an accuracy of the greater of 0.75 percent of the temperature being measured expressed in degrees Celsius or 4.0 Fahrenheit degrees. Each temperature measurement device shall be equipped with a recording device so that a permanent record is produced. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

(3) The permittee shall collect and record the following information for each month for the coating line and control equipment:

a. the name and identification number of each coating used;

b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per volume of applied coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per volume of coating solids, as applied) of all the coatings;

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

e. the calculated, controlled VOC emissions, in tons of VOC per month and tons of VOC per rolling, 12-month period. The controlled VOC emissions shall be calculated using the controlled VOC emission rate in d. above, the volume solids content per month from b. above and a factor of 2,000 pounds/ton;

f. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

g. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

h. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

(4) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(5) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(6) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

(2) The permittee shall notify the director (the Toledo Division of Environmental Services) of any daily record showing that the calculated, controlled VOC emission rate exceeds the OAC rule 3745-21-09(C)(1)(a)(ii) through (iv) pounds of VOC per gallon of solids limitation. A copy of such record shall be sent to the director (the Toledo Division of Environmental Services) within forty-five days after the exceedance occurs.

(3) The permittee shall submit quarterly reports to the Director (Toledo Division of Environmental Services) summarizing the following:

a. the operating time for the capture (collection) system(s), control device(s), monitoring equipment, and the associated emissions unit;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance; and

c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

If no such periods of deviation occur, the permittee shall submit a negative report.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled VOC emission rate exceeds the applicable mass of VOC per volume of applied coating solids limitation. The notification shall include a copy of such record.

(5) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled rolling 12-month VOC emission rate exceeds the applicable mass emission limitation. The notification shall include a copy of such record.

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

(7) 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

(8) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(9) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(10) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

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:

5% opacity as a 6-minute average from the RTO stack.

5% opacity as a 6-minute average from each oven combustion stack.

20% opacity as a 6-minute average from each oven combustion stack.

Applicable Compliance Method:

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

b. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

100 percent capture efficiency and a minimum of 95 percent control efficiency for the RTO.

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and the methods and procedures of OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

0.23 pound of VOC per gallon of applied coating solids.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.

e. Emission Limitation:

52.01 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(3)e.

f. Emission Limitation:

0.17 kilogram of VOC per liter of applied coating solids or

0.17×350 (0.160–RT) kg of VOC per liter of applied coating solids.

Applicable Compliance Method:

Compliance shall be demonstrated utilizing the methods and procedures of 40 CFR 60.393(c).

g. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161.

h. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3171.

i. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

j. Emission Limitations:

12.73 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.083 pound per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

k. Emission Limitation:

0.100 pound of NOx per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the

emission factor of 100 pounds of NOx per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitations:

15.33 tons of NOx per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.100 pound of NOx per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

m. Emission Limitation:

0.0019 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

n. Emission Limitations:

0.30 tons of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0019 pound of PE per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

o. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

p. Emission Limitations:

1.15 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

q. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM2.5 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

r. Emission Limitations:

1.15 tons of PM2.5 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM2.5 per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

s. Emission Limitation:

0.0006 pound of SO2/mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO2 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

t. Emission Limitations:

0.10 ton of SO2 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO2 per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

u. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on calculations using emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pound of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

v. Emission Limitations:

0.83 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (35.0 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

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

a. the emission testing shall be conducted within 30 days after achieving the maximum production rate at which the facility will be operated but not later than 180 days after the initial startup of the modified emissions unit;

b. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services;

c. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;

d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;

e. the permittee shall collect and record the 3-hour average combustion temperature within the thermal incinerator during testing; and

f. thepermittee shall collect and record monitoring parameters established to demonstrate that the emissions unit is in compliance with the 100 percent capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the local air agency' refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

(1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

**2. K022, Powder Anti-chip**

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

Electrostatic powder anti-chip guidecoat operation with control by particulate filtration for overspray, discharging within the building, and a 41.8 mmBtu per hour natural gas-fired curing oven

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

(1) g)(1).

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.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Electrostatic powder anti-chip guidecoat operation | | |
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 04-1102 issued 10/27/99) | the emissions of volatile organic compounds (VOC) from the guidecoat shall not exceed 3.25 tons during any rolling, 12-month period<br><br>see b)(2)a. |
| b. | OAC rules 3745-31-10 through 20<br>(PTI 04-1102 issued 10/27/99) | see b)(2)b. |
| c. | OAC rule 3745-17-07(B)(1) | visible emissions of fugitive dust shall not exceed 20 percent opacity, except for a period of time not to exceed three minutes during any 60-minute observation period |
| d. | OAC rule 3745-17-08(B), (B)(3) | see b)(2)c. |
| e. | OAC rule 3745-21-09(C)(1)(a)(v) | the emissions of VOC from this emissions unit shall not exceed 2.8 pounds per gallon of coating, excluding water and exempt solvents, or 15.1 pounds per gallon of deposited coating solids, on a daily basis |
| f. | 40 CFR Part 60, Subpart A<br>(60.1 through 60.19) | see b)(2)d. |
| g. | 40 CFR Part 60, Subpart MM<br>(60.390 through 60.398)<br><br>In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant guide coat operation subject to the emission | in accordance with 60.392(b), the emissions of VOC from this emissions unit shall not exceed 1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | limitations/control measures specified in this section. | |
| h | 40 CFR Part 63, Subpart A<br>(63.1 through 63.16) | see b)(2)e. |
| i. | 40 CFR Part 63, Subpart IIII<br>(63.3080 through 63.3176)<br><br>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section. | see b)(2)f.<br><br>[63.3091(a) and (b)] |
| 41.8 mmBtu per hour natural gas curing oven combustion emissions | | |
| j. | OAC rule 3745-31-05(A)(3)<br>(as effective 11/30/01) | the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed:<br><br>0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input;<br>15.20 tons of CO per rolling, 12-month period;<br>0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input;<br>18.31 tons of NOx per rolling, 12-month period;<br>0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input;<br>0.35 ton of PE per rolling, 12-month period;<br>0.0075 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per mmBtu of actual heat input;<br>1.38 tons of PM10 per rolling, 12-month period;<br>0.0075 pound of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per mmBtu of actual heat input;<br>1.38 tons of PM2.5 per rolling, 12-month period;<br>0.0006 pound of sulfur dioxide (SO2) per mmBtu of actual heat input;<br>0.11 ton of SO2 per rolling, 12-month period;<br>0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input;<br>0.99 ton of VOC per rolling, 12-month period; and<br>5% opacity as a 6-minute average from each oven combustion stack.<br><br>see b)(2)g. and b)(2)h. |
| k. | OAC rule 3745-31-05(A)(3)<br>(as effective 12/01/06) | the emissions from the oven combustion stack(s) serving this emissions unit shall not exceed: |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | 0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and<br>0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.<br><br>see b)(2)g. and b)(2)i. |
| l. | OAC rule 3745-17-07(A)(1) | visible particulate emissions from this emissions unit shall not exceed 20 percent opacity as a six-minute average |
| m. | OAC rule 3745-17-10(B)(1) | particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input |
| n. | OAC rule 3745-18-06(A) | see b)(2)j. |
| o. | 40 CFR Part 63, Subpart A<br>(63.1 through 63.16) | see b)(2)k. |
| p. | 40 CFR Part 63, Subpart DDDDD<br>(63.7480 through 63.7575)<br><br>In accordance with 40 CFR 63.7485, this emissions unit is an process heater that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section. | Applicable Emission Limits in Tables 1 and 2; Work Practice Standards in Table 3 and Operating Limits in Table 4 to Subpart DDDDD of 40 CFR Part 63 (subject to change based on the issuance of the Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD by U.S. EPA).<br><br>See b)(2)l. |

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(a)(v) and 40 CFR Part 60, Subpart MM.

b. The permittee shall employee only low VOC powder as a coating material in this emissions unit.

c. The permittee shall employ reasonably available control measures on the powder guidecoat operations associated with this emissions unit for the purpose of ensuring compliance with the applicable requirements. The permittee has committed to utilize inherent fabric filtration and adequate enclosure to minimize or eliminate visible particulate emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. Implementation of these control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B), (B)(3).

d. 40 CFR Part 63, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

e. 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.

f. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

g. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

i. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO2), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

j. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

k. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

l. The requirements of 40 CFR Part 63, Subpart DDDDD are currently effective due to the January 9, 2012 decision by the United States District Court for the District of Columbia to vacate the administrative stay that U.S. EPA put in place during the reconsideration of the March, 2011 final rules. On February 7, 2012, U.S. EPA issued a “No Action Assurance“ letter to facilities and indicated that U.S. EPA will exercise its enforcement discretion to not pursue enforcement action of violations of the Initial Notification deadlines established in the rule. This letter further notes that U.S. EPA has proposed revisions to the compliance dates for all units (the date by which a unit must be in compliance with the substantive requirements in the Boiler MACT rule) and to the subcategories for some units. U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012.

c) Operational Restrictions

(1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

(2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

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

(3) The permittee shall utilize only compliant coatings, not exceeding the 15.1 pound per gallon of deposited coating solids limitation, in this emissions unit.

(4) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(5) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(6) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

(2) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

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

(4) Pursuant to OAC 3745-21-09(C)(4), the permittee shall maintain daily records that demonstrate compliance with OAC rule 3745-21-09(C)(1)(a)(v) in accordance with the USEPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA 450/3-88-018) and any subsequent revisions thereof. The permittee shall calculate and record the VOC emission rates for the guidecoat operation in pounds of VOC per gallon of coating, excluding water and exempt solvents, or in pounds of VOC per gallon of deposited solids on a daily basis, using the overall capture and control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emission unit was in compliance.

(5) The permittee, having chosen to demonstrate compliance through the use of compliant coatings (i.e., only low VOC powder coatings shall be utilized as a coating material and each powder shall comply with the applicable emission limitation as applied), shall collect and record the following information for each month for the coating line:

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

b. the mass of VOC per volume of coating solids of each coating, as applied.

c. the applied volume of coating solids of each coating;

d. the monthly emissions of VOC (the summation of b. x c. for all coatings) and the rolling, 12-month summation of the monthly emissions, in tons per year.

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

(6) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(7) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(8) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

e) Reporting Requirements

**(1)** The permittee shall submit quarterly reports that identify:

a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and

**b.** any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

(3) The permittee shall notify the Director (Toledo Division of Environmental Services) of any daily record showing that the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environmental Services) within 30 days after the event occurs.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.

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

(6) 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.

(7) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(8) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(9) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

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:

5% opacity as a 6-minute average from each oven combustion stack.

Applicable Compliance Method:

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

b. Emission Limitation:

20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

3.25 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation will be demonstrated by the record keeping requirements of d)(5)d.

e. 2.8 pounds per gallon of coating, excluding water and exempt solvents, or 15.1 pounds of VOC per gallon of deposited solids on a daily basis.

Applicable Compliance Method:

Where applicable, compliance shall be demonstrated pursuant to the methods and procedures set forth in the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", EPA-450-3-88-018, dated December 1988, and any subsequent revision approved by the USEPA and the State of Ohio Environmental Protection Agency, as provided in OAC rule 3745-21-09(C)(4) . Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

1.40 kilograms of VOC per liter (11.7 pounds of VOC per gallon) of applied coating solids on a monthly basis.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.

g. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161.

h. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3171.

i. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

j. Emission Limitations:

15.20 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.083 pound per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

k. Emission Limitation:

0.100 pound of NOx per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NOx per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitations:

18.31 tons of NOx per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.100 pound of NOx per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

m. Emission Limitation:

0.019 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This emissions limitation is less than the result of calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

n. Emission Limitations:

0.35 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0019 pound PE per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

o. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

p. Emission Limitations:

1.38 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

q. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM2.5 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

r. Emission Limitations:

1.38 tons of PM2.5 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM2.5 per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

s. Emission Limitation:

0.0006 pound of SO2/mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO2 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

t. Emission Limitations:

0.11 ton of SO2 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO2 per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

u. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pound of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

v. Emission Limitations:

0.99 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (41.8 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

**3. K023, Topcoat**

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

Topcoat with 2 natural gas infrared flash tunnels and 2 indirect fired drying ovens with a combined actual heat input capacity of 50.4 mmBtu per hour

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

(1) g)(1)

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.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| two automotive topcoat booths with waterwash filtration, using waterborne basecoat and solvent-borne clearcoat, with control by regenerative thermal oxidizer (RTO) on the two clearcoat drying ovens | | |
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 04-1102 issued 10/27/99) | the emissions from this emissions unit shall not exceed 66.9 tons of particulate emissions equal to 10 microns or less in diameter (PM10) as a rolling, 12-month summation<br><br>visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity as a 6-minute average<br><br>see b)(2)a. through b)(2)c. |
| b. | OAC rules 3745-31-10 through 20<br>(PTI 04-1102 issued 10/27/99) | the emissions from this emissions unit shall not exceed:<br>15.3 pounds of PM10 per hour,<br>8.63 pounds of volatile organic compounds (VOC) per gallon of applied coating solids on a monthly basis, and 768.68 tons of VOC as a rolling, 12-month summation |
| c. | OAC rule 3745-17-07(A)(1) | see b)(2)d. |
| e. | OAC rule 3745-17-11(C)(1),(C)(2) | see b)(2)e. |
| f. | OAC rule 3745-21-09(C)(1)(c) | emissions of VOC from this emissions unit shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids on a daily basis |

| | | |
|---|---|---|
| g. | 40 CFR Part 60, Subpart A<br>(60.1 through 60.19) | see b)(2)f. |
| h. | 40 CFR Part 60, Subpart MM<br>(60.390 through 60.398)<br><br>In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant topcoat coat operation subject to the emission limitations/control measures specified in this section. | in accordance with 60.392(c), the emissions of VOC from this emissions unit shall not exceed 1.47 kilograms of VOC per liter (12.3 pounds of VOC per gallon) of applied coating solids on a monthly basis |
| i. | 40 CFR Part 63, Subpart A<br>(63.1 through 63.16) | see b)(2)g. |
| j. | 40 CFR Part 63, Subpart IIII<br>(63.3080 through 63.3176)<br><br>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section. | see b)(2)h.<br><br>[63.3091(a)] |
| two natural gas infrared flash tunnels and two indirect fired, drying ovens with a combined heat input capacity of 50.4 mmBtu per hour; combustion emissions | | |
| k. | OAC rule 3745-31-05(A)(3)<br>(as effective 11/30/01) | the combined emissions from the oven combustion stacks serving this emissions unit shall not exceed:<br><br>0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input;<br>18.33 tons of CO per rolling, 12-month period;<br>0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input;<br>22.08 tons of NOx per rolling, 12-month period;<br>0.0019 pound of particulate emissions (PE) per mmBtu of actual heat input;<br>0.42 ton of PE per rolling, 12-month period;<br>0.0075 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per mmBtu of actual heat input;<br>1.66 tons of PM10 per rolling, 12-month period;<br>0.0075 pound of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per mmBtu of actual heat input;<br>1.66 tons of PM2.5 per rolling, 12-month period;<br>0.0006 pound of sulfur dioxide (SO2) per mmBtu of |

| | | |
|---|---|---|
| | | actual heat input;<br>0.14 ton of SO2 per rolling, 12-month period;<br>0.0054 pound of volatile organic compounds (VOC) per mmBtu of actual heat input;<br>1.20 tons of VOC per rolling, 12-month period; and<br>5% opacity as a 6-minute average from each oven combustion stack.<br><br>see b)(2)i. and b)(2)j. |
| l. | OAC rule 3745-31-05(A)(3)<br>(as effective 12/01/06) | the combined emissions from the combustion stacks serving this emissions unit shall not exceed:<br><br>0.083 pound of carbon monoxide (CO) per mmBtu of actual heat input; and<br>0.100 pound of nitrogen oxides (NOx) per mmBtu of actual heat input.<br><br>see b)(2)i. and b)(2)k. |
| m. | OAC rule 3745-17-07(A)(1) | visible particulate emissions from this emissions unit shall not exceed 20 percent opacity as a six-minute average |
| n. | OAC rule 3745-17-10(B)(1) | particulate emissions (PE) from the oven combustion stack(s) shall not exceed 0.020 pound per million Btu of actual heat input |
| o. | OAC rule 3745-18-06(A) | see b(2)l. |
| p. | 40 CFR Part 63, Subpart A<br>(63.1 through 63.16) | see b)(2)m. |
| q. | 40 CFR Part 63, Subpart DDDDD<br>(63.7480 through 63.7575)<br><br>In accordance with 40 CFR 63.7485, this emissions unit is an process heater that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section. | Applicable Emission Limits in Tables 1 and 2; Work Practice Standards in Table 3 and Operating Limits in Table 4 to Subpart DDDDD of 40 CFR Part 63 (subject to change based on the issuance of the Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD by U.S. EPA).<br><br>See b)(2)n. |

(2) Additional Terms and Conditions

a. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be operated and maintained in accordance with the manufacturer's recommendations.

b. In order to maintain compliance with the applicable VOC emission limitation(s), the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal

oxidizer is in operation, shall not be below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20 and 40 CFR Part 60, Subpart MM.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

e. The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a waterwash particulate filter, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).

f. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

g. 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.

h. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

i. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

j. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

k. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO2), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

l. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

m. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

n. The requirements of 40 CFR Part 63, Subpart DDDDD are currently effective due to the January 9, 2012 decision by the United States District Court for the District of Columbia to vacate the administrative stay that U.S. EPA put in place during the reconsideration of the March, 2011 final rules. On February 7, 2012, U.S. EPA issued a "No Action Assurance" letter to facilities and indicated that U.S. EPA will exercise its enforcement discretion to not pursue enforcement action of violations of the Initial Notification deadlines established in the rule. This letter further notes that U.S. EPA has proposed revisions to the compliance dates for all units (the date by which a unit must be in compliance with the substantive requirements in the Boiler MACT rule) and to the subcategories for some units. U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012.

c) Operational Restrictions

(1) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

In the event the waterwash system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the incinerator is in operation as a VOC control device for compliance purposes, shall not be below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

(3) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

(4) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

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

(5) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(6) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(7) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Toledo Division of Environmental Services upon request.

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

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

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

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

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

(2) Pursuant to OAC 3745-21-09(C)(4), the permittee shall maintain daily records for the topcoat process that will enable the permittee to calculate the VOC emission rate in order to demonstrate compliance with the emissions limitation identified in OAC rule 3745-21-09(C)(1)(c) for the topcoat process in accordance with the USEPA's Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Truck Topcoat Operations (EPA-45-/3-88-028, Dec. 1988) and any

subsequent revisions thereof. The permittee shall calculate and record the VOC emission rates for the topcoat operation in pounds of VOC per gallon of coating, excluding water and exempt solvents, or in pounds of VOC per gallon of deposited solids on a daily basis, using the overall capture and control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emission unit was in compliance.

(3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the firebox of the thermal incinerator when the incinerator is in operation. Each temperature measurement device shall be installed, calibrated, and maintained according to accepted practice and the manufacturer's specifications, with any modifications deemed necessary by the permittee and approved by the Toledo Division of Environmental Services. The device shall have an accuracy of the greater of 0.75 percent of the temperature being measured expressed in degrees Celsius or 4.0 Fahrenheit degrees. Each temperature measurement device shall be equipped with a recording device so that a permanent record is produced. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations.

(4) The permittee shall collect and record the following information for each month for the coating line and control equipment to demonstrate compliance with the VOC limitations of OAC rule 3745-31-10 through 20:

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

b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the monthly volume-weighted average VOC content (in mass of VOC per volume of applied coating solids) of all the coatings;

d. the calculated, controlled VOC emission rate, in mass of VOC per volume of applied coating solids. The controlled VOC emission rate shall be calculated using the daily volume-weighted VOC content and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

e. the calculated, controlled VOC emissions, in tons of VOC per month and tons of VOC per rolling, 12-month period.

f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

For purposes of compliance with the requirements of OAC rule 3745-31-10 through 20, alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

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

(6) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(7) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(8) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

e) Reporting Requirements

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

(2) The permittee shall notify the Director (Toledo Division of Environmental Services) of any daily record in the calendar quarter during which the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating, excluding water and exempt solvents, or pounds of VOC per gallon of deposited solids on a daily basis exceeded the emissions limitation specified in OAC rule 3745-21-09(C)(1)(c), and the actual VOC emission rate for each such day. The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environmental Services) within 45 days after the event occurs.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. If no such periods of deviation occur, the permittee shall submit a negative report.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the monthly pounds of VOC per gallon of applied coating solids exceeds the applicable limitation. The notification shall include a copy of such record.

(5) The permittee shall submit quarterly deviation (excursion) reports that identify all records showing that the tons of VOC per rolling, 12-month period exceeded the applicable limitation. The notification shall include a copy of such record.

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

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

(8) 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.

(9) See 40 CFR Part 60, Subpart MM (60.390 through 60.398).

(10) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).

(11) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

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:

5% opacity as a 6-minute average.

20% opacity as a 6-minute average.

Applicable Compliance Method:

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

b. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

15.3 pounds of PM10 per hour from the paint booth and curing oven (RTO) stacks.

Applicable Compliance Method:

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

M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

66.9 tons of PM10 as a rolling, 12-month summation.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the short term emission limitation (15.3 pounds of PM10 per hour), by the maximum annual hours of operation (8,760 hours) and then divide by 2,000 pounds per ton.

e. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids on a daily basis.

Applicable Compliance Method:

Compliance shall be demonstrated pursuant to the methods and procedures set forth in the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", EPA-450-3-88-018, dated December 1988, and any subsequent revision approved by the USEPA and the State of Ohio Environmental Protection Agency, as provided in OAC rule 3745-21-09(C)(4).

f. Emission Limitation:

1.47 kilograms of VOC per liter (12.3 pounds of VOC per gallon) of applied coating solids on a monthly basis.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids.

g. Emission Limitation:

8.63 pounds of VOC per gallon of applied coating solids on a monthly basis.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

768.68 tons of volatile organic compounds (VOC) as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated by the record keeping requirements of d)(4)e.

i. Emission Limitation:

100 percent capture efficiency and a minimum of 95 percent control efficiency from the RTO.

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and the methods and procedures of OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

j. Emission Limitation:

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161.

k. Emission Limitation:

combined HAP emissions shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3171.

l. Emission Limitation:

0.083 pound of CO per mmBtu actual heat input.Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution

Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

m. Emission Limitations:

18.33 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.083 pound per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

n. Emission Limitation:

0.100 pound of NOx per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NOx per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

o. Emission Limitations:

22.08 tons of NOx per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.100 pound of NOx per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

p. Emission Limitation:

0.0019 pound of PE per million Btu of actual heat input.

Applicable Compliance Method:

This emissions limitation is less than the result of calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

q. Emission Limitations:

0.42 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0019 pound of PE per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

r. Emission Limitation:

0.0075 pound of PM10 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

s. Emission Limitations:

1.66 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM10 per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

t. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM2.5 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

u. Emission Limitations:

1.66 tons of PM2.5 per rolling, 12-month period..

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0075 pound PM2.5 per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

v. Emission Limitation:

0.0006 pound of SO2/mmBtu actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO2 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

w. Emission Limitations:

0.14 ton of SO2 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0006 pound SO2 per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

x. Emission Limitation:

0.0054 pound of VOC/mmBtu of actual heat input.

Applicable Compliance Method:

This emissions limitation was developed based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pound of VOC per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

y. Emission Limitations:

1.20 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. This emissions limitation was developed based on calculations performed as follows: multiply the technical emission limitation (0.0054 pound VOC per mmBtu), by the maximum fuel heat input rate (50.4 mmBtu per hour), and by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

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

a. the emission testing shall be conducted within 30 days after achieving the maximum production rate at which the facility will be operated but not later than 180 days after the initial startup of the modified emissions unit;

b. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services;

c. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;

d. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;

e. the permittee shall collect and record the 3-hour average combustion temperature within the thermal incinerator during testing; and

f. thepermittee shall collect and record monitoring parameters established to demonstrate that the emissions unit is in compliance with the 100 percent capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the local air agency' refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

(1) Should any coating formulations cause a nuisance odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

**4. P008, Sealers and Adhesives**

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

Automotive sealers and adhesives and a 12.0 mmBtu/hr indirect fired natural gas gel oven, with control by appropriate work practices: TNAP.

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.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sealant and adhesive emissions | | |
| a. | ORC 3704.03(T) | the emissions of volatile organic compounds (VOC) from all sealers and adhesives utilized in this emissions unit shall not exceed 0.5 pound per gallon, excluding water and exempt solvents, on a monthly basis<br><br>see b)(2)a. and b)(2)b. |
| b. | OAC rule 3745-31-05(D) | the emissions of VOC from sealants and adhesives shall not exceed 77.49 tons per rolling, 12-month period<br><br>see b)(2)c. |
| c. | OAC rule 3745-21-07(G)(9)(f) | see b)(2)d. and b(2)e. |
| d. | OAC rule 3745-21-09(U)(1)(d) | the emissions of VOC from any material which is applied to metallic surfaces shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents |
| e. | OAC rule 3745-21-09(U)(1)(g) | the emissions of VOC from any glass adhesion body primer coating used for the installation of any glass windows shall not exceed 4.9 pounds per gallon of coating, excluding water and exempt solvent |

| | | |
|---|---|---|
| f. | 40 CFR Part 63, Subpart A (63.1 through 63.16) | see b)(2)f. |
| g. | 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)<br><br>In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section. | In accordance with 40 CFR 63.3091(c) the average organic hazardous air pollutant (HAP) emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.<br><br>see b)(2)g. |
| 12.0 mmBtu per hour indirect fired, natural gas gel oven combustion emissions | | |
| h. | OAC rule 3745-31-05(A)(3), as effective 11/30/01 | emissions from the stack(s) serving this emissions unit shall not exceed:<br><br>0.083 pound per mmBtu and 4.37 tons of carbon monoxide (CO) per rolling, 12-month period<br><br>0.100 pound per mmBtu and 5.26 tons of nitrogen oxides (NOx) per rolling, 12-month period<br><br>0.0019 pound per mmBtu and 0.10 ton of particulate emissions (PE) per rolling, 12-month period<br><br>0.0075 pound per mmBtu and 0.40 ton of particulate matter less than or equal to 10 microns in diameter (PM10) per rolling, 12-month period<br><br>0.0075 pound per mmBtu and 0.40 ton of particulate matter less than or equal to 2.5 microns in diameter (PM2.5) per rolling, 12-month period<br><br>0.0006 pound per mmBtu and 0.04 ton of sulfur dioxide ($SO_2$) per rolling, 12-month period<br><br>0.0054 pound per mmBtu and 0.29 ton of volatile organic compounds (VOC) per rolling, 12-month period<br><br>visible particulate emissions from this |

| | | |
|---|---|---|
| | | emissions unit shall not exceed 5 percent opacity as a six-minute average<br><br>see b)(2)h. and b)(2)i. |
| i. | OAC 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 | see b)(2)j. |
| j. | OAC rule 3745-17-07(A)(1) | visible particulate emissions from this emissions unit shall not exceed 20 percent opacity as a six-minute average |
| k. | OAC rule 3745-17-10(B)(1) | 0.020 pound PE per mmBtu actual heat input |
| l. | OAC rule 3745-18-06(A) | see b)(2)k. |
| m. | 40 CFR Part 63, Subpart A (63.1 through 63.16) | see b)(2)l. |
| n. | 40 CFR Part 63, Subpart DDDDD (63.3080 through 63.3176)<br><br>In accordance with 40 CFR 63.7485, this emissions unit is an process heater that is located at, or is part of, a major source of HAP subject to the emission limitations/control measures specified in this section. | Applicable Emission Limits in Tables 1 and 2; Work Practice Standards in Table 3 and Operating Limits in Table 4 to Subpart DDDDD of 40 CFR Part 63 (subject to change based on the issuance of the Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD by U.S. EPA).<br><br>See b)(2)m. |

(2) Additional Terms and Conditions

a. The permittee shall employ only dispensers and disposal containers appropriate to minimize exposure times in this emissions unit. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d) and OAC rule 3745-21-09(U)(1)(g).

c. The maximum sealer and adhesive usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$77.49 \text{ tons VOC} \geq \sum_{i=1}^{n}(SA_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

$SA_i$ = usage of sealer and/or adhesive material *i*, gallons
$VOC_i$= volatile organic compound content of material *i*, pounds per gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

d. The permittee shall employ no photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in the emissions unit.

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

f. 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.

g. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII upon the date of startup of this affected source after modification.

h. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants emitted at less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)g., b)(2)i. and f)(2)c. through q.

j. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the carbon monoxide (CO), nitrogen oxides (NOx), particulate emissions (PE), particulate matter less than or equal to 10 microns in diameter (PM10), particulate matter less than or equal to 2.5 microns in diameter (PM2.5), sulfur dioxide (SO2), and volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for CO, NOx, PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

k. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

l. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.

m. The requirements of 40 CFR Part 63, Subpart DDDDD are currently effective due to the January 9, 2012 decision by the United States District Court for the District of Columbia to vacate the administrative stay that U.S. EPA put in place during the reconsideration of the March, 2011 final rules. On February 7, 2012, U.S. EPA issued a “No Action Assurance“ letter to facilities and indicated that U.S. EPA will exercise its enforcement discretion to not pursue enforcement action of violations of the Initial Notification deadlines established in the rule. This letter further notes that U.S. EPA has proposed revisions to the compliance dates for all units (the date by which a unit must be in compliance with the substantive requirements in the Boiler MACT rule) and to the subcategories for some units. U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012.

c) Operational Restrictions

(1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:

The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

(2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

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

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

(4) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

d) Monitoring and/or Recordkeeping Requirements

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

(2) For each sealer or adhesive utilized in this emissions unit, the permittee shall record a determination of whether the sealer or adhesive material is photochemically reactive or non-photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

(3) For purposes of compliance with the emissions limitation for material applied to metallic surfaces (3.5 pounds VOC per gallon, excluding water and exempt solvents) the permittee shall collect and record on a monthly basis the following information:

a. the name and identification number of each sealer and adhesive applied to metallic surfaces; and

b. the VOC content, excluding water and exempt solvents, of each sealer and adhesive applied to metallic surfaces.

(4) For purposes of compliance with the emissions limitation for glass adhesion body primers (4.9 pounds VOC per gallon, excluding water and exempt solvents) the permittee shall collect and record on a monthly basis the following information:

a. the name and identification number of each glass adhesion body primer utilized; and

b. the VOC content, excluding water and exempt solvents, of each glass adhesion body primer utilized.

(5) For purposes of compliance with the emissions limitation for sealers and adhesives (0.5 pound of VOC per gallon, excluding water and exempt solvents, on a monthly basis), the permittee shall collect and record the following information each month for this emissions unit:

a. When using complying coatings for all sealers and adhesives:

i. the name and identification number of each sealer and adhesive, as applied; and

ii. the VOC content, excluding water and exempt solvents, of each sealer and adhesive, as applied.

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

b. When calculating a monthly volume-weighted average VOC content for the sealers and adhesives;

i. the name and identification number of each sealer and adhesive, as applied;

ii. the VOC content, excluding water and exempt solvents, and the number of gallons, excluding water and exempt solvents, of each sealer and adhesive, as applied; and

iii. the volume-weighted average VOC content of all sealer and adhesive, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

(6) For purposes of compliance with the rolling, 12-month VOC emissions limitation for sealers and adhesives (77.49 tons), the permittee shall collect and record on a monthly basis the following information for all sealer and adhesive operations:

a. the company identification for each sealer and adhesive utilized;

b. the number of gallons of each sealer and adhesive utilized, $SA_i$;

c. the volatile organic compound content of each sealer and adhesive utilized, in pounds per gallon, $VOC_i$;

d. the total VOC emissions from all sealers and adhesives utilized, in tons; $\sum_{i=1}^{n}(SA_i)(VOC_i) \div (2000 \text{ pounds/ton})$; and

e. the rolling, 12-month total quantity of VOC emissions, in tons.

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

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

(8) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

e) Reporting Requirements

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

(2) The permittee shall submit quarterly deviation (excursion) reports identifying the use of any photochemically reactive sealer or adhesive material I this emissions unit.

(3) The permittee shall notify the Director (the Toledo Division of Environmental Services) of any monthly record showing the use of a sealer or adhesive in this emissions unit and applied to metallic surfaces which exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

(4) The permittee shall notify the Director (the Toledo Division of Environmental Services) of any monthly record showing the use of a glass adhesion body primer which exceeded 4.9 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

(5) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the 0.5 pound of VOC per gallon, excluding water and exempt solvents, emissions limitation. The notification shall include a copy of such record.

(6) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all sealants and adhesives utilized in this emissions unit exceed 77.49 tons per rolling, 12-month period.

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

(8) 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.

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

(10) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

f) Testing Requirements

(1) Compliance with the emission limitations for sealers and adhesives emissions in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall employ no photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

Applicable Compliance Method:

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

b. Emission Limitation:

0.5 pound of VOC per gallon, excluding water and exempt solvents

Applicable Compliance Method :

Compliance shall be determined through the monitoring and record keeping requirements of d)(5).

If, required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3).

If required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4).

If required, compliance shall be determined through the methods and procedures of OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular non-production maintenance material, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that non-production maintenance material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

77.49 tons VOC per rolling 12-month period.

Applicable Compliance Method :

Compliance shall be determined through the monitoring and record keeping requirements of d)(6).

f. Emission Limitation:

0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3151.

(2) Compliance with the emission limitations for oven burner emissions in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

20% opacity as a 6-minute average.

Applicable Compliance Method:

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

b. Emission Limitation:

0.020 pound PE per mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emission Limitation:

5% opacity as a 6-minute average.

Applicable Compliance Method:

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

d. Emission Limitation:

0.083 pound CO per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998, as follows: divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

4.37 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.083 pound of CO per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.10 pound of NOx per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998 as follows: divide the emission factor of 100 pounds of NOx emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

5.26 tons of NOx per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emission limitation of 0.10 pound of NOx per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 1.9 pounds of PE emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

i. Emission Limitation:

0.10 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0019 pound of PE per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

j. Emission Limitation:

0.0075 pound of PM10 per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 7.6 pounds of PM10 emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51 Appendix. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

k. Emission Limitation:

0.40 ton of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0075 pound of PM10 per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

l. Emission Limitation:

0.0075 pound of PM2.5 per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 7.6 pounds of PM2.5 emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51 Appendix. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

m. Emission Limitation:

0.40 ton of PM2.5 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0075 pound of PM2.5 per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

n. Emission Limitation:

0.0006 pound of $SO_2$ per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 0.6 pounds of $SO_2$ emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

o. Emission Limitation:

0.04 ton of $SO_2$ per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0006 pound of $SO_2$ per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

p. Emission Limitation:

0.0054 pound of VOC per mmBtu of heat input.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

q. Emission Limitation:

0.29 ton of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the technical emissions limitation of 0.0054 pound

of VOC per mmBtu by the maximum heat input capacity of 12.0 mmBtu per hour and by 8,760 hours per year and divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.