

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

11/2/2012

Mr. Roger Brown
Chrysler Group LLC- Wrangler Paint Facility
4400 Chrysler Drive
Toledo, OH 43608

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0448011731
Permit Number: P0110183
Permit Type: Administrative 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 Environmental Protection Agency (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 "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

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

Sincerely,


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

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

Certified Mail

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Chrysler Group, LLC owns and operates automobile manufacturing plants in Toledo, Ohio. This facility is referred to as the Wrangler Paint facility and was issued a permit to operate in 2004 which limited the potential to emit of the paint shop for PSD purposes by restricting the annual rate of production of the vehicles being built. While environmentally friendly changes have occurred in the operation of the coating line which have reduced the level of “per vehicle” emissions, the annual production limitation remains. Chrysler has requested that the basis of the emissions limitations in the 2004 permit (PTI 04-01358) be reviewed and that alternate, equivalent operating restrictions be established and made enforceable through administrative modifications to the Permit to Install and Title V permit for this facility.

3. Facility Emissions and Attainment Status:

Lucas County is currently in attainment status for all criteria pollutants, however in 2004 Lucas county was classified as 8-hr non-attainment for ozone.

The allowable emissions for the 2004 permit were:

pollutant	CO	NOx	PE	PM10	SO2	VOC
TPY	36.40	37.89	24.44	40.36	9.19	600.66

This permit will acknowledge the addition of 9.6 tons per year of PE and 15 tons per year of VOC to the totals from the 2004 PSD review for this facility caused by subtracting a like amount from the allowable emissions allocated to facility 0448010414 to represent the transfer of K404 and K405 by the action of P0110320. The new allowable emissions rate for PDS purposes will become:

pollutant	CO	NOx	PE	PM10	SO2	VOC
TPY	36.40	37.89	34.04	40.36	9.19	615.66

4. Source Emissions:

This administrative modification will not revise any allowable levels of emissions, however a typographical error was corrected in K302, changing the issued NOx BAT for natural gas combustion from 5.1 to 5.23 tons per year. This increase in an individual permit allowable emissions limitation was considered to be a minor permit change as BACT for NOx for this emissions unit is based on a joint facility-wide fuel usage limitation, which remains unchanged.



5. Conclusion:

The permit is non-controversial and should be issued draft final to provide federal enforceability.

6. Please provide additional notes or comments as necessary:

See below.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	36.40 (no increase)
NOx	37.89 (no increase)
PE	34.04 (9.6 increase)
PM10	40.36 (no increase)
SO2	9.19 (no increase)
VOC	615.66 (15.0 increase)

Additional Notes

Prior to comment on the requested permit changes, a review of the origin of the limitations is relevant. In 2004 DaimlerChrysler proposed the construction of a “Suppliers Park” assembly plant/complex adjacent to the two existing facilities; the Toledo North Assembly Plant (TNAP) and the Stickney Ave Plant. The Suppliers Park was to be an entirely new facility where the body shop, paint shop, rolling chassis and final assembly facilities were managed as, and by, separate entities.

Supplier Park facility-wide increases were established as:

tons per year	EU	CO	NOx	PE	PM10	SO2	VOC
Total emissions		61.26	64.48	69.53	51.28	27.22	676.35
significance level (tpy)		100	40	15	25	40	non-attainment



As significant increases of NOx, PE and PM10 occurred, PSD review was required for those pollutants. The resultant enforceable emissions for the Wrangler Paint Facility (WPF - 0448011731) and the new construction at the TNAP (0448010414) became:

tons per year	EU	CO	NOx	PE	PM10	SO2	VOC						
paint shop (0401358)	B301 & B304	36.40	37.89	1.09	3.65	9.19	2.36						
	B302 & B305 thru B333												
	B303												
	K301							0.05	0.05	2.1			
	K302							0.05	0.05	2.0			
	K303							21	35.86	300.6			
	P301							-	-	-	-	47.7	
	P302							-	-	-	-	160.6	
	P303							-	-	-	-	77.0	
	P304							-	-	-	-	8.3	
	P305							-	-	2.25	0.75	-	
	subtotal							36.40	37.89	24.44	40.36	9.19	600.66
	final assembly (04-01359)							B402	11.56	12.44	0.52	1.41	9.01
F401		14	2.8	-									
G401		-	-	3.1									
K401		2.4	1.85	16.5									
K402		4.8											
K403		4.8											
K404		4.8											
K405		4.8											



tons per year	EU	CO	NOx	PE	PM10	SO2	VOC		
	K406			2.4					
	K407			2.4					
	K408			1.1				0.85	19.3
	K409			-				-	0.4
	P401			-				-	10.0
	P402			-				-	7.0
	Subtotal			11.56				12.44	42.02
Total for WPF & TNAP		47.96	50.33	66.46	47.27	18.20	657.70		

The transfer of K404 and K405 to the WPF occurred 2008 as a modification to PTI 04-01358. The changes to be made in this modification to the original permit must maintain enforceability of the PSD limitations. PE was made enforceable in the TNAP permit by calculation based on the SIP limitation. To be federally enforceable in the WPF, 9.6 tpy PE was transferred from the TNAP facility PSD total allowable emissions to the WPF allowable PE. Also PTI 04-01359 was revised on 11/29/2007 to restrict the individual VOC emissions from K402 and K403 from 14 tons per year to 0.5 tons per year. The joint limitation for K401 through K407 is no longer needed as the total allowable emissions of K401 through K407 are now equal to those of the individual installed sources K402, K403 and K407, i.e., 1.5 tons per year of VOC. This allowed 15 tons per year of VOC to be transferred from the TNAP to the WPF for PSD review purposes.

The table below represents the transfer of K404 and K405 PTE for PSD review purposes from TNAP to the WPF.

tons per year	EU	CO	NOx	PE	PM10	SO2	VOC
paint shop (04-01358)	B301 & B304	36.40	37.89	1.09	3.65	9.19	2.36
	B305 thru B310						



tons per year	EU	CO	NOx	PE	PM10	SO2	VOC	
	B303							
	K301			0.05	0.05		2.1	
	K302			0.05	0.05		2.0	
	K303			21	36.01 ¹		300.6	
	K404			4.8			15.0	
	K405			4.8				
	P301	-	-	-	-	-	-	47.7
	P302	-	-	-	-	-	-	160.6
	P303	-	-	-	-	-	-	77.0
	P304	-	-	-	-	-	-	8.3
	P305	-	-	-	2.25	0.75	-	-
	subtotal	36.40	37.89	34.04	40.51	9.19	615.66	
	final assembly (04-01359)	B402	11.56	12.44	0.52	1.41	9.01	0.74
F401		14			2.8	-		
G401		-			-	3.1		
K401 ²		2.4			1.85	-		
K402		4.8				0.5		
K403		4.8				0.5		
K406 ²		2.4			-			
K407		2.4			0.5			
K408 ²		1.1			0.85	19.3		
K409		-			-	0.4		
P401		-			-	10.0		
P402		-			-	7.0		



tons per year	EU	CO	NOx	PE	PM10	SO2	VOC
	Subtotal	11.56	12.44	32.42	6.91	9.01	42.04
Total for WPF & TNAP		47.96	50.33	66.46	47.42	18.20	657.70

- 1 Was 35.86, a math error was reported and corrected in P0108955.
- 2 Updated for the WPF to include only those sources actually installed, for TNAP these emissions units were not installed, but the allowable emissions have not been removed for purposes of this discussion.

K302

The changes to be made in this modification of the original permit must maintain enforceability of the PSD limitations. For PSD, the Ohio EPA requires three emissions limitations to be set for each subject pollutant: a technical limitation, an hourly limitation and an annual limitation. As an example, the first source for which Chrysler requested a review was K302. The required PSD emissions limitations expressed in K302, the electrostatic powder anti-chip primer spray booth were; 98% control efficiency for particulate, 0.01 pound per hour of PM10, 0.05 ton of PM10 per rolling, 12-month period, 0.05 pound of VOC per gallon of applied coating solids as a monthly volume-weighted average, 1.7 pounds per hour of volatile organic compounds (VOC) and 2.0 tons of VOC per rolling, 12-month period.

As issued Sept 2, 2004, PTI 04-01358 contained adequate monitoring record keeping and reporting to provide a demonstration of compliance with the PM10 and VOC limitations. However, while the PM10 restriction was calculated as potential to emit at 8760 hours per year, the VOC limitation contained an additional synthetic minor restriction based on the anticipated maximum rate of production (200,064 jobs per year) which was made enforceable by the monitoring, recordkeeping and reporting in K303. The VOC emissions limitations were established based on a one-time calculation of the worst case operating scenario (82 jobs/hour and 200,064 jobs per year) and a company supplied emissions factor (0.02 pound VOC/job). Since the unrestricted PTE would have been established as 1.7 pounds per hour x 8760 hours per year, or 7.45 tons per year VOC, the production limitation was added to restrict the VOC emissions to 2.0 tons per year. Chrysler indicated in the submittal of May 22, 2012, that the 2.0 tons per year restriction would be made federally enforceable by the maximum material usage rate. 2.0 tons VOC per year x 2000 pounds per ton ÷ 0.05 pound of VOC per gallon of applied coating solids establishes the alternate equivalent throughput limitation as 80,000 gallons of applied coating solids per year.



Chrysler asserts that the keeping of records indicating that the VOC content will not exceed 0.05 pound per gallon of applied coating solids on a monthly average basis and maintaining records of usage to demonstrate compliance with the annual emission limit of 2.0 tons per rolling, 12-month period is adequate to demonstrate compliance with the PSD VOC limitation. Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to limit potential to emit.

Please note that the original PTI for this source correctly cited OAC rule 3745-21-09(C)(1)(b) as the applicable SIP requirement. Our review indicates that the similar Chrysler operation K022 at the TNAP facility (0448010414) used the citation OAC rule 3745-21-09(C)(1)(a)(v). (C)(1)(b) applies to electrostatic deposition of a sprayed powder. (C)(1)(a)(i) applies to the electrodeposition of solids suspended in a liquid. K022 was incorrect and will be adjusted accordingly, as defined in OAC rule 3745-21-01. However, we have updated the terms and conditions of K302 to closely resemble the format of K022. This change recognizes the facility's assertion that the fabric filtration system operates as an inherent component of the powder coating operation. 98% control efficiency would not normally be selected as an appropriate BACT for an inherently controlled source since it implies a control requirement beyond the level provided by the inherent control. If we were requested to review the BACT, grains per scft, or pounds per ton of coating applied solids, might be selected as more appropriate limitations. To avoid confusion, the permit will be written with a notation that the use of the inherent control device satisfies the 98% control requirement.

Changes will be also made to the permits for K301, K303, K404, K405, P301, P302, P304 and P305 (which are summarized as follows):

K301

The required PSD emissions limitations expressed in K303 in the TNAP permit were:

From the e-coat tank and 5 mmBtu incinerator operations:

0.085 pound of NOx per mmBtu, 0.43 pound of NOx per hour,
0.0019 pound of PE per mmBtu, 0.01 pound of PE per hour,
0.0075 pound of PM10 per mmBtu, 0.04 pound of PM10 per hour,
0.04 pound of VOC per gallon of applied coating solids in K301 as a volume-weighted average on a monthly basis, 0.27 pound of VOC per hour, 2.1 tons of VOC from coatings in K301 as a rolling, 12-month summation, and the combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, and K303 shall not exceed the following: 37.89 tons of NOx, 1.09 tons of PE, 3.65 tons of PM10 and 2.36 tons of VOC per rolling, 12-month period,

E-coat oven, 29.6 mmBtu oven burners and a thermal oxidizer of up to 5 mmBtu:

0.085 pound of NOx per mmBtu, 3.0 pounds of NOx per hour,
0.0019 pound of PE per mmBtu, 0.07 pound of PE per hour,
0.0075 pound of PM10 per mmBtu, 0.26 pound of PM10 per hour,
0.04 pound of VOC per gallon of applied coating solids as a volume-weighted average in K301 on a monthly basis, 1.5 pounds of VOC per hour, 2.1 tons of VOC from coatings in K301 as a rolling, 12-month summation, and



the combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, and K303 shall not exceed the following: 37.89 tons of NO_x, 1.09 tons of PE, 3.65 tons of PM₁₀ and 2.36 tons of VOC per rolling, 12-month period,

touch-up booth:

98% control efficiency for particulate, 0.01 pound per hour of PE, 0.05 ton of PE per rolling, 12-month period,

98% control efficiency for particulate, 0.01 pound per hour of PM₁₀, 0.05 ton of PM₁₀ per rolling 12-month period,

0.04 pound of VOC per gallon of applied coating solids in K301 as a volume-weighted average on a monthly basis, and 0.01 pound per hour of volatile organic compounds (VOC) and 2.1 tons of VOC from coatings in K301 as a rolling, 12-month summation.

As issued Sept 2, 2004, PTI 04-01358 contained adequate monitoring record keeping and reporting to provide a demonstration of compliance with the BACT and LAER emissions limitations. However, while the touchup booth particulate and combustion gas limitations were calculated as potential to emit at 8760 hours per year, the limitations for VOC contained an additional synthetic minor restriction based on the anticipated maximum rate of production (200,064 jobs per year) which was made enforceable by the monitoring, recordkeeping and reporting requirements. The VOC (2.1 tons of VOC) emissions limitations were established based on a one-time calculation of the worst case operating scenario (82 jobs/hour and 200,064 jobs per year) and a company supplied emissions factor (0.021 pound VOC per job).

PTI 04-01358 was last modified in 2011 to address a revision of the control equipment. The previous PSD restrictions carry over into the most recent PTI issued for this source (P0108955 effective 11/16/2011) as follows:

e-coat tank and oven emissions from coating:

The combined emissions of VOC from the E-coat line shall not exceed 0.04 pound of volatile organic compounds per gallon of applied coating solids as a volume-weighted average on a monthly basis.

The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line (K301), shall not exceed 2.1 tons as a rolling, 12-month summation.

oven combustions emissions:

0.085 pound of NO_x per mmBtu,

0.0019 pound particulate emissions (PE) per mmBtu,

0.0075 pound of PM₁₀ per mmBtu, and

the combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed 37.89 tons of NO_x, 1.09 tons of PE, 3.65 tons of PM₁₀ and 2.36 tons of VOC per rolling, 12-month period.



touch-up booth:

98% control efficiency for particulate, 0.01 pound per hour of PE, 0.05 ton of PE per rolling, 12-month period,

98% control efficiency for particulate, 0.01 pound per hour of PM10, 0.05 ton of PM10 per rolling 12-month period,

0.04 pound of VOC per gallon of applied coating solids in K301 as a volume-weighted average on a monthly basis, and 0.01 pound per hour of volatile organic compounds (VOC) and 2.1 tons of VOC from coatings in K301 as a rolling, 12-month summation.

Chrysler asserts that the keeping of records indicating that the VOC content will not exceed 0.04 pound per gallon of applied coating solids on a monthly average basis and maintaining records of usage to demonstrate compliance with the annual emission limit of 2.1 tons per rolling, 12-month period is adequate to demonstrate compliance with the PSD VOC limitation . Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to limit potential to emit.

Combustion is restricted by maximum annual natural gas usage for B301 through B333, K301, K302, K303, K404 and K405 not exceeding 845 mmscf.

Chrysler asserts that a one-time calculation which demonstrates compliance with the particulate emissions limitations for the touch-up booth is adequate to demonstrate compliance with the PSD PE and PM10 limitations. Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to demonstrate compliance for an insignificant source of particulate emissions.

Please note: the applicability of OAC rule 3745-17-11(C)(1),(C)(2) has been removed from the 2011 terms as the touch-up booth qualifies for an exemption under the authority of OAC rule 3745-17-11(C)(3).

VE observations have not been added to the permit as Chrysler proposed that the touchup booth qualifies for treatment as a "clean" source consistent with the 2002 OEPA "clean" language quoted as follows:

"Operational restrictions and monitoring, record keeping and reporting requirements for spray booths or coating operations that are subject to OAC rules 3745-17-07 and -11.

Require that the water curtain or dry filtration system be in service whenever the spray booth or coating operation is in operation.

This option is obviously for spray booths and coating operations that have some overspray. Although we do not normally consider the water curtain or dry filtration systems to be add-on controls (most are integral components of the booth itself), they are the means by which the emissions unit complies with the particulate and visible particulate emission limitations. Under normal operations, these emissions units have not had a problem complying with the particulate and visible particulate emission limitations. As such, ensuring that these systems are in service whenever the emissions unit is in operation should ensure compliance with the applicable requirements."



K303

The required PSD emissions limitations expressed in K303 in the TNAP permit were:

From the paint spraying operations:

4.8 pounds PE per hour and 21 tons of PE per rolling 12-month period
0.0015 g/scf, 30 pounds of PM10 per hour (82 @0.36 #/job) and 36.01 tons of PM10 per rolling, 12-month period (200,064 @0.36 #/job)
100% capture and 95% control of VOC, 5.42#VOC/gacs, 247#VOC/hr (82@3.0#/job) and 300.6 ton VOC per rolling, 12-months (200,064@3.0#/job)
0.085 pound NOx per mmBtu, 1.4 lb/hr NOx and 6.2 tons of NOx per year (PTE @ 16mmBtu/hr)

From the oven burner combustion gases (hourly are PTE @ 66mmBtu/hr, rolling, 12-month limits are joint for all emissions units located at this WPF):

0.085 pound NOx per mmBtu, 5.6 pound NOx per hour and 37.89 tons of NOx per rolling, 12-month period
0.0019 pound PE per mmBtu, 0.13 pound PE per hour and 1.09 ton of PE per rolling, 12-month period,
0.0075 pound PM10 per mmBtu, 0.50 pound PM10 per hour, and 3.65 tons of PM10 per rolling, 12-month period
0.0054 pound VOC per mmBtu, 0.36 pound of VOC per hour and 2.36 ton of VOC per rolling, 12-month period.

The technical and hourly limits can be transferred directly to the WPF. Please note that the installed oven burner capacity was only 16.24 mmBtu per hour, which resulted in reduced hourly allowable combustion gas emissions rates in later permit modifications.

As issued Sept 2, 2004, PTI 04-01358 contained adequate monitoring record keeping and reporting to provide a demonstration of compliance with the BACT and LAER emissions limitations. However, while the combustion gas limitations were calculated as potential to emit at 8760 hours per year, the paint spraying operation limitations for PM10 and VOC contained an additional synthetic minor restriction based on the anticipated maximum rate of production (200,064 jobs per year) which was made enforceable by the monitoring, recordkeeping and reporting requirements. The particulate (36.01 tons of PM10) and VOC (300.6 tons of VOC) emissions limitations were established based on a one-time calculation of the worst case operating scenario (82 jobs/hour and 200,064 jobs per year) and a company supplied emissions factor (0.36 pound of PM10 and 3.0 pounds VOC per job).

Although other solutions are possible, one alternate restriction would add the joint PM10 emissions contributions of K404 and K405 to the existing limitation of this emissions unit. The joint emissions limitation for K303, K404 and K405 would become 36.01 tons of PM10 as a rolling, 12-month summation. K404 and K405 have a demonstrated potential to emit of 0.62 tpy PM10 each. The joint emissions limitation for K303, K404 and K405 would be demonstrated by a one-time calculation as follows:



$2 (0.62 \text{ tpy PM}_{10}) + X \text{ dscfm} (0.0015 \text{ gr/dscf})(1 \text{ lb}/7000 \text{ gr})(1 \text{ ton}/2000 \text{ lb})(60 \text{ min/hr})(8760 \text{ hr/yr}) = 36.01 \text{ ton PM}_{10}$

$X \text{ dscfm} = (36.01 \text{ tpy} - 1.24 \text{ tpy}) [(7000)(2000) \div (0.0015)(60)(8760)] = 617,000 \text{ dscfm}$

Where compliance with the 0.0015 g/dscf and 617,000 dscfm restrictions are demonstrated by one-time stack testing.

As a check for compliance with the hourly emissions limitation for K303 (30 pounds of PM₁₀ per hour)

$617,000 \text{ dscfm} (0.0015 \text{ gr/dscf})(1 \text{ lb}/7000 \text{ gr})(60 \text{ min/hr}) = 7.93 \text{ pounds of PM}_{10} \text{ per hour.}$

PE was made enforceable in the TNAP permit by calculation based on the SIP limitation. The evaluation of the validity of this limitation was not as stringent as that for PM₁₀. Therefore, we accept that control requirements adequate for a demonstration of compliance with PM₁₀ will also satisfy the requirements for PE and will not review the PE determination further.

K303 is currently restricted by emissions limitations of 5.42#VOC/gacs and 300.6 tons VOC per year.

$300.6 \text{ tpy} (2000 \text{ lb/t}) \div (5.42 \text{ lb/gacs}) = \text{a maximum rate of } 110,000 \text{ gacs per year}$

Chrysler asserts that the keeping of records indicating that the VOC content will not exceed 5.42 pounds per gallon of applied coating solids on a monthly average basis and maintaining records of usage to demonstrate compliance with the annual emission limit of 300.6 tons per rolling, 12-month period is adequate to demonstrate compliance with the PSD VOC limitation. Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to limit potential to emit

Please note, applicability of OAC rule 3745-17-11(C)(1),(C)(2) has been removed from the permit as the emission unit qualified for the exemption of OAC rule 3745-17-11(C)(3). VE observations were added to the permit consistent with OEPA policy, however the frequency of stack observations has been reduced to once per month and fugitive observations have been removed based on the case-by-case Ohio EPA determination made for the similar Chrysler owned emissions unit K023 at the TNAP facility (0448010414).

It should also be noted that another variance from the standard library term for incinerator temperature monitoring exists. While the PSD review for this permit established an operating requirement of "The average combustion temperature within any thermal oxidizer, for any 3-hour block of time when the oxidizer 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." the Ohio EPA has determined that an adequate monitoring for this requirement is " 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature" (P0110002 for 0448010414) in variance with the PSD determination. Further the most recent permit modification for this emissions unit (P0108955) removed the



apparent compliance temperature monitoring term from the permit. The authority for a 3-hr average monitoring requirement is derived from OAC rule 3745-21-09(B) which is not applicable to this emissions unit as it is regulated by OAC rule 3745-21-09(C)(1)(c) and subsequently required to comply by OAC rule 3745-21-09(C)(4). However as this monitoring requirement is not required to SIP purposes, it was established as a compliance requirement in the original PTE as a PSD requirement and is applicable under the requirements of NSPS MM. Therefore compliance with OAC rule 3745-21-09(C)(4) will be considered to include this monitoring, and the reporting requirement will remain in the permit, although it has been changed from “not below” to “50 degrees below” to comply with the previous Ohio EPA case-by-case determination.

K404 and K405

The transfer of K404 and K405 to the WPF occurred in 2008 as a modification to PTI 04-01358. The changes to be made in this modification of the original permit must maintain enforceability of the PSD limitations. For PSD, the Ohio EPA requires three emissions limitations to be set for each subject pollutant: a technical limitation, an hourly limitation and an annual limitation. The required PSD emissions limitations expressed in K404 and K405 in the TNAP permit were:

From the painting and sanding operations:

98% control of particulate emissions, 0.551 pounds PE per hour and 2.4 tons of PE per rolling 12-month period

98% control of particulate emissions, 1.6 pounds of PM10 per hour and K401 thru K407 shall not exceed 1.85 tons of PM10 per rolling, 12-month period.

4.8 pounds of VOC per gallon, 12 pounds of volatile organic compounds (VOC) per hour and K401 thru K407 shall not exceed 16.5 tons of VOC per rolling, 12-month period.

From the combustion gases:

0.085 pound NOx per mmBtu, 0.43 pound NOx per hour and B401 through B403 and K402 through K405 shall not exceed 12.44 tons of NOx per rolling, 12-month period

0.0019 pound PE per mmBtu, 0.01 pounds PE per hour and B401 through B403 and K402 through K405 shall not exceed 0.52 ton of PE per rolling, 12-month period,

0.0075 pound PM10 per mmBtu, 0.04 pound PM10 per hour, and B401 through B403 and K402 through K405 shall not exceed 1.41 tons of PM10 per rolling, 12-month period

0.0054 pound VOC per mmBtu, 0.03 pound of VOC per hour and B401 through B403 and K402 through K405 shall not exceed 0.74 ton of VOC per rolling, 12-month period.

BACT was set at 4.8 tons PE per year for the combined painting and sanding operations with the notation that should all sanding be performed in the booth, the quantities were not additive.

The technical and hourly limits can be transferred directly to the WPF. We propose that the facility-wide limitations be revised as follows:

As issued Sept 2, 2004, PTI 04-01359 contained adequate monitoring record keeping and reporting to provide a demonstration of compliance with the BACT and LAER emissions limitations. However, while the combustion gas limitations were calculated as potential to emit at



8760 hours per year, the painting and sanding operation limitations contained an additional synthetic minor restriction based on the anticipated maximum rate of production (200,064 jobs per year) which was made enforceable by the monitoring, recordkeeping and reporting in K303. The particulate (1.85 tons of PM10) and VOC (16.5 tons of VOC) emissions limitations were established based on a one-time calculation of the worst case operating scenario (82 jobs/hour and 200,064 jobs per year) and a company supplied emissions factor (0.0185 pound of PM10 and 0.165 pound VOC for K401 thru K407 combined per job).

Moving these emissions units to the WPF and removing the production limitation requires a revision of the PSD restrictions. A revision is being made to the TNAP permit which will reduce the combined VOC emissions of K401 thru K407 to 1.5 tpy allowing 15 tons per year to be assigned as a joint limitation for K404 and K405:

$15 \text{ tpy (2000 lb/t)} \div (4.8 \text{ lb/gal}) = \text{a maximum usage rate of 6,250 gallons per year of coating}$

Chrysler asserts that the keeping of records indicating that the VOC content will not exceed 4.8 pounds per gallon on a monthly average basis and maintaining records of usage to demonstrate compliance with the annual emission limit of 15.0 tons per rolling, 12-month period is adequate to demonstrate compliance with the PSD VOC limitation. Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to limit potential to emit

PE was made enforceable in the TNAP permit by calculation based on the SIP limitation. To be federally enforceable in the WPF the simplest solution is to transfer 9.6 tpy PE from the TNAP facility PSD total allowable emissions to the WPF PSD review. The table above represents this transfer of K404 and K405 PTE for PSD review purposes.

Although other solutions are possible, one possible solution for the transfer of K404 and K405 to the WPF would add the joint PM10 emissions contributions of K404 and K405 to the existing limitation of emissions unit K303. The joint emissions limitation for K303, K404 and K405 would become 36.01 tons of PM10 as a rolling, 12-month summation.

Chrysler asserts that the one-time calculation presented below demonstrates compliance with the particulate emissions limitations for all operations in the spray booth and sanding stations for K403 and K404 and is adequate to demonstrate compliance with the PSD PE and PM10 limitations. Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to demonstrate compliance for an insignificant source of particulate emissions.

$(1-98\%)[(0.096 \text{ pound PE\&PM10/station-hour from sanding})(2 \text{ stations})(8760 \text{ hours/year}) + (7700 \text{ gallons})(15.0 \text{ pounds/gallon})(80\% \text{ solids content})(1-35\% \text{ transfer efficiency})] \div 2000 \text{ pounds/ton} = 0.62 \text{ tons of PM10 per year}$

Since K404 and K405 have a demonstrated potential to emit of 0.62 tpy PM10 each. The joint emissions limitation for K303, K404 and K405 would be demonstrated by a one-time calculation as follows:



$2 (0.62 \text{ tpy PM}_{10}) + 617,000 \text{ dscfm} (0.0015 \text{ gr/dscf})(1 \text{ lb}/7000 \text{ gr})(1 \text{ ton}/2000 \text{ lb})(60 \text{ min}/\text{hr})(8760 \text{ hr}/\text{yr}) = 36.01 \text{ ton PM}_{10}$

Where compliance with the 0.0015 g/dscf and 617,000 dscfm restrictions for K303 are demonstrated by one-time stack testing.

Please note:

When K404 and K405 were transferred from TNAP to the WPF by the authority of PTI 04-01358 as issued 1/31/2008, several revisions occurred to the BAT for PTI 04-1359 as issued 9/24/2004. In reviewing we noted that the 2008 permit the following emissions limitations were removed from the 2004 permit:

- 1.6 pounds per hour of PM₁₀
- 12 pounds of VOC per hour,
- 0.42 pound of CO per hour,
- 0.43 pound of NO_x per hour,
- 0.01 pound of PE per hour,
- 0.04 pound of PM₁₀ per hour,
- 0.01 pound of SO₂ per hour,
- 0.03 pound of VOC per hour, and
- 0.65 pound of PM₁₀ per hour.

In general the removal of these limitations does not affect the enforceability of the permit as in each case the hourly emissions limitation is equivalent to the full hourly potential to emit emissions at the maximum allowable "technical limitation". However as the 2004 permit underwent PSD review, Ohio EPA policy requires those criteria pollutants which underwent review (PE, PM₁₀, NO_x and VOC) to include an hourly emissions limitation. Presumably Ohio EPA approved the removal of these emissions limitations on a case-by-case basis. Therefore, we will not attempt to restore these emissions limitations by this action, but note that their exclusion from the permit conflicts with Ohio EPA policy. We also note that the original BAT determination of 1.85 tons of PM₁₀ per year from the painting and sanding operations has been reduced to 0.62 ton per year in the 2008 action.

VE observations have not been added to the permit as Chrysler proposed that the touchup booth qualifies for treatment as a "clean" source consistent with the 2002 OEPA "clean" language quoted as follows:

"Operational restrictions and monitoring, record keeping and reporting requirements for spray booths or coating operations that are subject to OAC rules 3745-17-07 and -11.

Require that the water curtain or dry filtration system be in service whenever the spray booth or coating operation is in operation.



This option is obviously for spray booths and coating operations that have some overspray. Although we do not normally consider the water curtain or dry filtration systems to be add-on controls (most are integral components of the booth itself), they are the means by which the emissions unit complies with the particulate and visible particulate emission limitations. Under normal operations, these emissions units have not had a problem complying with the particulate and visible particulate emission limitations. As such, ensuring that these systems are in service whenever the emissions unit is in operation should ensure compliance with the applicable requirements.”

P301

The VOC emissions limitations were established based on a one-time calculation of the worst case operating scenario (82 jobs/hour and 200,064 jobs per year) and a company supplied emissions factor (0.48 pound VOC/job). Since the unrestricted PTE would be established as 40 pounds per hour x 8760 hours per year, or 173 tons per year VOC, a production limitation is considered to be required to restrict the VOC emissions to 47.7 tons per year. Chrysler indicated in the submittal of May 22, 2012, that the 47.7 tons per year restriction is to be made federally enforceable by a material usage rate restriction. 47.7 tons per year x 2000 pounds per ton ÷ 0.3 pound of VOC per gallon, minus water, establishes the alternate equivalent throughput limitation as 318,000 gallons of coating per year. In the corresponding operation at the TNAP (0448010414 P008) Chrysler provided a demonstration that numerous sealers and adhesives were in use in the facility and that the installation was not subject to a throughput limitation for federal enforceability by virtue of being “surface coating operations with numerous and unpredictable use of coatings containing varying VOC content, where add-on control equipment is not employed”. P301 will be revised to reflect the permitting determination of P008. No annual throughput limitation will be set.

Since no window installation occurs at the WPF, the reference to OAC rule 3745-21-09(U)1)(g) was removed from the terms transferred from the P008 reference permit.

P302

The VOC emissions limitations were established based on a one-time calculation of the worst case operating scenario (200,064 jobs per year) and a company supplied emissions factor (1.61 pound VOC/job).

Chrysler requested a restriction based on the maximum material usage and maximum VOC content, however failed to provide any information on either restriction. The corresponding emissions unit at the TNAP is P007, Non-production maintenance materials, spray boot cleaning and purge applications. Similar to P008, P007 was not subject to a throughput limitation for federal enforceability as a “surface coating operations with numerous and unpredictable use of coatings containing varying VOC content, where add-on control equipment is not employed”. P302 will be revised to reflect the permitting determinations of P007. No throughput limitation will be set.

Please note: the NOx emissions limitation for P302 was revised by the action of the modification to PTI 04-01358 issued on 1/31/2008 to correct the annual restriction from 5.1 to 5.23 tons per year, correcting a math error. This correction change has been carried into this permit.



P304

The VOC emissions limitations were established based on a one-time calculation of the worst case operating scenario (200,064 jobs per year) and a company supplied emissions factor (0.083 pound VOC/job). Chrysler requested a restriction based on the maximum material usage and maximum VOC content, however failed to provide any information on either restriction. Since it is likely that only one type of material will be utilized, a limitation on throughput is appropriate for this source. The corresponding emissions unit at the TNAP is P014, application station for foam sound deadening. In setting emissions limitations for P014, Chrysler volunteered an enforceable emissions limitation of 8.67 tons per year, which was equated to PTE at production rate of 327,000 vehicles per year, and 0.053 pound VOC per vehicle. In P014, we were directed by OEPA to accept a tons per year limitation to be demonstrated by monthly calculation. This determination will be extended to the P304 permit. No throughput limitation will be set.

P305

The particulate emissions limitations for this emissions unit were established in 04-01358 as 98% overall control, 1.9 pounds PE per hour, 2.25 tons PE per rolling, 12-month period, 0.62 pound PM10 per hour and 0.75 ton PM10 per rolling, 12-month period. These emissions limitations were based on the technical support document accompanying the original permit application with a company provided maximum emissions rate of 0.75 ton per year of PM10 emitted in a combined total of 36,000 scfm of exhaust (Table 5-2). This was equated to one-time calculation of the worst case operating scenario (200,064 jobs/hour) and a company supplied emissions factor (0.0075 pound PM10/job)

PE was assigned an emissions limitation believed to be appropriate relative to the level of PM10. A factor of 3 for the ratio of PE:PM10 is not unusual, so with no knowledge of the particle distribution discharging the fabric filter controlling a sanding operation, an arbitrary value of 3 was used.

Chrysler asserts that the following one-time calculation demonstrates compliance with the particulate emissions limitations for the sanding operations and adequate to demonstrate compliance with the PSD PE and PM10 limitations. Ohio EPA has determined that Chrysler's proposed revisions are an acceptable means to demonstrate compliance for an insignificant source of particulate emissions.

$(1-0.98)(0.096 \text{ pound of PM10 per hour - work station})(6 \text{ stations in use})(24 \text{ hours per day})(365 \text{ days per year})(1 \text{ ton per } 2000 \text{ lbs}) = 0.05 \text{ ton of PM10 per year}$
 $(1-0.98)(0.288 \text{ pound of PE per hour - work station})(6 \text{ stations in use})(24 \text{ hours per day})(365 \text{ days per year})(1 \text{ ton per } 2000 \text{ pounds}) = 0.15 \text{ ton of PE per year}$

Where PE emissions are estimated at 3 times the level of PM10 emissions previously established by stack testing of a similar source.



In the original PTI, the emissions of particulate from the sanding operations were thought to be fugitive in nature, and are therefore subject to OAC rules 3745-17-07(B) and 3745-17-08(B). Engineering Guide #75 clarified applicability of the fugitive dust rules to identify this source as being subject to OAC rules 3745-17-07(A) and 3745-17-11(B)(1) only (Scenario #28). (B)(1) establishes the process weight rate limitation which was more stringent than the Table II restriction. With an allowable emissions rate of 1.9 pounds PE per hour and 98% control:

$$1.9 \text{ pounds PE/hr} \div (1-0.98) = 95 \text{ pounds PE per hour uncontrolled}$$

At an assumed 5% rate of loss by sanding PWR becomes 1900 pounds per hour = P = 0.95 ton per hour

$$(E) = 4.10 (P)^{0.67} = 4.10 (0.95)^{0.67} = 3.96 \text{ pounds PE per hour}$$

Therefore (B)(1) will be referenced as less stringent than the BAT limitation.

It should be noted that VE observations were included as the required monitoring approach in the original draft PTI, but were removed before issuance of the final 2004 PTI. We will assume that the company provided adequate justification for the use of the "clean" language for this source and contrary to the OEPA standard practice of requiring daily VE observations, the operation of the filtration system will be considered adequate demonstration of compliance monitoring for this source.

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Chrysler Group LLC- Wrangler Paint Facility

Issue Date: 11/2/2012
Permit Number: P0110183
Permit Type: Administrative Modification
Permit Description: Administrative Modification to substitute an alternate equivalent restriction for enforceability of PSD emissions limitations
Facility ID: 0448011731
Facility Location: Chrysler Group LLC- Wrangler Paint Facility
3800 Stickney Avenue,
Toledo, OH 43608
Facility Description: Automobile Manufacturing

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: Robert Kossow, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Chrysler Group LLC- Wrangler Paint Facility

Facility ID:	0448011731
Permit Number:	P0110183
Permit Type:	Administrative Modification
Issued:	11/2/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Chrysler Group LLC- Wrangler Paint Facility

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	7
9. Reporting Requirements	7
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	9
14. Public Disclosure	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	18
1. K301, E-Coat	19
2. K302, Powder Anti-Chip.....	42
3. K303, Topcoat.....	61
4. P301, Sealer & Adhesive Application	87
5. P302, Topcoat Purge, Line Cleaning & Booth Cleaning	93
6. P304, Foam Injection (Deadener)	96



- 7. P305, Topcoat/E-Coat/Anti-Chip Sanding 100
- 8. Emissions Unit Group - Rapid Reprocess 1 and 2: K404 and K405 104



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0110183
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011731
Facility Description: Paint Shop portion of Automotive and Light Duty Truck Assembly
Application Number(s): M0001734, M0001766, M0001785
Permit Number: P0110183
Permit Description: Administrative Modification to substitute an alternate equivalent restriction for enforceability of PSD emissions limitations
Permit Type: Administrative Modification
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/2/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Chrysler Group LLC- Wrangler Paint Facility
3800 Stickney Avenue
Toledo, OH 43608

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

Ohio Environmental Protection Agency (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: P0110183

Permit Description: Administrative Modification to substitute an alternate equivalent restriction for enforceability of PSD emissions limitations

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

Emissions Unit ID:	K302
Company Equipment ID:	Powder Anti-Chip
Superseded Permit Number:	04-01358
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K303
Company Equipment ID:	Topcoat
Superseded Permit Number:	P0108955
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K404
Company Equipment ID:	Rapid Reprocess #1
Superseded Permit Number:	P0104249
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K405
Company Equipment ID:	Rapid Reprocess #2
Superseded Permit Number:	P0104249
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P301
Company Equipment ID:	Sealer & Adhesive Application
Superseded Permit Number:	04-01358
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P302
Company Equipment ID:	Topcoat Purge, Line Cleaning & Booth Cleaning
Superseded Permit Number:	04-01358
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P304
Company Equipment ID:	Foam Injection (Deadener)
Superseded Permit Number:	04-01358
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P305
Company Equipment ID:	Topcoat/E-Coat/Anti-Chip Sanding
Superseded Permit Number:	04-01358
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0110183
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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



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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission



limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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



removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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



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.



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0110183
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Facility-wide restrictions on fuel oil and natural gas combustion established under the authority of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 thru 27 in PTI 04-01358 as issued Sept 9, 2004 and modified by this permitting action:
 - a) Applicable Emissions Limitations:
 - (1) The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - a. 36.40 tons of CO per rolling, 12-month period,
 - b. 37.89 tons of NOx per rolling, 12-month period,
 - c. 1.09 tons of PE per rolling, 12-month period,
 - d. 3.65 tons of PM10 per rolling, 12-month period,
 - e. 9.19 tons of SO2 per rolling, 12-month period, and
 - f. 2.36 tons of VOC per rolling, 12-month period.
 - (2) These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting a maximum 845 mmscf per year of natural gas and a maximum 250,000 gallons per year of fuel oil. Therefore, if compliance is shown with the fuel usage limitations, compliance shall also be shown with the annual emission limitations.
 - b) Operational Restrictions
 - (1) The maximum annual natural gas usage for emissions units B301 through B333, K301, K302, K303, K404 and K405 shall not exceed 845 mmscf, based upon a rolling, 12 month summation of the natural gas usage figures.
 - (2) The maximum annual fuel oil usage for emissions units B301 and B304 shall not exceed 250,000 gallons, based upon a rolling, 12-month summation of the fuel oil usage figures.
 - (3) This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas and fuel oil usage figures, upon issuance of this permit.
 - c) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of natural gas (in cubic feet) and fuel oil burned in all emissions units located at the paint shop facility. The monitoring equipment shall be installed, calibrated, operated,



and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any amendments deemed necessary by the permittee.

- (2) The permittee shall maintain monthly records of the total quantity of natural gas (in cubic feet per month) burned in B301 through B333, K301, K302, K303, K404 and K405.
- (3) The permittee shall maintain monthly records of the total quantity of fuel oil (in gallons per month) burned in B301 and B304.
- (4) The permittee shall maintain monthly records of the rolling, 12-month total quantity of natural gas (in cubic feet per rolling, 12-month period) and fuel oil (in gallons per rolling, 12-month period) burned in B301 through B333, K301, K302, K303, K404 and K405.

d) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of all exceedances of the rolling, 12-month natural gas usage limitation, and the actual cumulative quantity of fuel burned for each such month.
- (2) The permittee shall submit quarterly deviation (excursion) reports that include an identification of all exceedances of the rolling, 12-month fuel oil usage limitation, and the actual cumulative quantity of fuel burned for each such month.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (4) 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.

e) Testing Requirements

- (1) Compliance with the Emissions Limitations specified in section 2.a) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

36.40 tons of CO per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301 through B333, K301, K302, K303, K404 and K405. Compliance may be demonstrated through calculations performed as follows:

- i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98 (84 pounds of CO per million standard cubic), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.



ii. multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (5 pounds of CO per 1000 gallons), by the maximum fuel usage rate (250,000 gallons per year), and then divide by 2,000 pounds per ton.

iii. Sum the results of i. + ii.;

35.49 tons CO per year from gas + 0.63 ton CO per year from fuel oil =
36.12 tons per year CO.

b. Emission Limitation:

37.89 tons of NOx per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301 through B333, K301, K302, K303, K404 and K405. Compliance may be demonstrated through calculations performed as follows:

i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98 (50 pounds of NOx emissions per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

ii. multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (10 pounds of NOx per 1000 gallons), by the maximum fuel usage rate (250,000 gallons per year), and then divide by 2,000 pounds per ton.

iii. Sum the results of i. + ii.;

21.13 tons NOx per year from gas + 1.25 tons NOx per year from fuel oil =
22.38 tons per year NOx.

c. Emission Limitation:

1.09 tons of PE per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301 through B333, K301, K302, K303, K404 and K405. Compliance may be demonstrated through calculations performed as follows:

i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (1.9 pounds of PE per



million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

- ii. multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (2 pounds of particulate emissions per 1000 gallons), by the maximum fuel usage rate (250,000 gallons per year), and then divide by 2,000 pounds per ton.

- iii. Sum the results of i. + ii.;

0.81 ton PE per year from gas + 0.25 ton PE per year from fuel oil = 1.06 tons per year PE.

- d. Emission Limitation:

3.65 tons of PM10 per rolling, 12-month period,

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301 through B333, K301, K302, K303, K404 and K405. Compliance may be demonstrated through calculations performed as follows:

- i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (7.6 pounds of PM10 per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.

- ii. multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (3.3 pounds of particulate emissions per 1000 gallons), by the maximum fuel usage rate (250,000 gallons per year), and then divide by 2,000 pounds per ton.

- iii. Sum the results of i. + ii.;

3.22 tons PM10 per year from gas + 0.42 ton PM10 per year from fuel oil = 3.64 tons per year PM10.

- e. Emission Limitation:

9.19 tons of SO2 per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301 through B333, K301, K302, K303, K404 and K405. Compliance may be demonstrated through calculations performed as follows:



- i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (0.6 pound of SO₂ emissions per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.
 - ii. multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (142S pounds of particulate emissions per 1000 gallons, where S = 0.5), by the maximum fuel usage rate (250,000 gallons per year), and then divide by 2,000 pounds per ton.
 - iii. Sum the results of i. + ii.;
- 0.26 ton SO₂ per year from gas + 8.88 tons SO₂ per year from fuel oil = 9.14 tons per year SO₂.

f. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for emissions units B301 through B333, K301, K302, K303, K404 and K405. Compliance may be demonstrated through calculations performed as follows:

- i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (5.5 pounds of VOC emissions per million standard cubic feet), by the maximum fuel usage rate (845 mmscf per year), and then divide by 2,000 pounds per ton.
 - ii. multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (0.2 pound of VOC per 1000 gallons), by the maximum fuel usage rate (250,000 gallons per year), and then divide by 2,000 pounds per ton.
 - iii. Sum the results of i. + ii.;
- 2.33 tons VOC per year from gas + 0.03 ton VOC per year from fuel oil = 2.36 tons per year VOC.

3. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart MM: K301, K302 and K303. 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.



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0110183
Facility ID: 0448011731

Effective Date: To be entered upon final issuance

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K301, K302 K303. K404, K405, P301, P302 and P304. 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.
5. 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 unit in this permit is subject to the aforementioned requirements: K301, K302, K303, K404 and K405.



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility
Permit Number: P0110183
Facility ID: 0448011731
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K301, E-Coat

Operations, Property and/or Equipment Description:

Electrodeposition (E-Coat) prime coat of Automobile and/or Light Duty Trucks with regenerative thermal oxidizer (RTO) on oven exhaust

- 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 prime coat (E-Coat) tank and E-coat oven (coating emissions)		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-1358 as issued 9/2/2004)	0.27 pound of volatile organic compounds (VOC) per hour, 1.2 tons of VOC per year, and see b)(2)a. through b)(2)d.
b.	OAC rule 3745-21-09(C)(1)(a)(i)	See b)(2)e.
c.	OAC rule 3745-31-21 thru 27 (PTI 04-1358 as issued 9/2/2004)	See b)(2)f. through b)(2)h.
d.	40 CFR Part 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)i.
e.	40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398) 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.	The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart MM. See b)(2)e. and b)(2)j. [60.392(b)]
f.	40 CFR Part 63 Subpart A (40 CFR 63 .1 through 63.16)	See b)(2)k.
g.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an	See b)(2)l. [63.3091(a) and (b)]



Draft Permit-to-Install

Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	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.	
14.05 mmBtu/hour direct fired low NOx natural gas E-coat oven burners (combustion emissions)		
i.	OAC rule 3745-31-05(A)(3) (PTI 04-1358 as issued 9/2/2004)	0.083 pound of carbon monoxide (CO) per mmBtu, 1.2 pounds of CO per hour, 5.3 tons of CO per year, 1.2 pounds of nitrogen oxides (NOx) per hour, 5.1 tons of NOx per year, 0.03 pound of PE per hour, 0.12 ton of PE per year, 0.11 pound of PM10 per hour, 0.46 ton of PM10 per year, 0.0006 pound of sulfur dioxide (SO2) per mmBtu, 0.009 pound of SO2 per hour, 0.04 ton of SO2 per year, 5% opacity as a 6 minute average, and see b)(2)m. and b)(2)n.
j.	OAC rule 3745-17-07(A)(1)	See b)(2)e.
k.	OAC rule 3745-17-11(B)(1)	See b)(2)o.
l.	OAC rule 3745-18-06(E)	See b)(2)e. and b)(2)p.
m.	OAC rule 3745-31-05(D) (PTI 04-1358 as issued 9/2/2004)	See b)(2)q. and b)(2)r.
n.	OAC rule 3745-31-10 thru 20 (PTI 04-1358 as issued 9/2/2004)	0.085 pound of NOx per mmBtu, 0.0019 pound particulate emissions (PE) per mmBtu, 0.0075 pound of PM10 per mmBtu, and see b)(2)q. and b)(2)s.
o.	OAC rule 3745-31-21 thru 27 (PTI 04-1358 as issued 9/2/2004)	0.085 pound of NOx per mmBtu, and see b)(2)q. and b)(2)t.
p.	40 CFR Part 63 Subpart A (40 CFR 63 .1 through 63.16)	See b)(2)u.
q.	40 CFR Part 63 Subpart DDDDD (40 CFR 63 .7480 through 63.7575) In accordance with 40 CFR 63.7485, this emissions unit process heater as defined in §63.7575 that is located at a facility which is a major source of	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart DDDDD. See b)(2)v.



Draft Permit-to-Install

Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	HAPs subject to the emission limitations/control measures specified in this section.	
Touch up booth controlled by a dry filtration device		
r.	OAC rule 3745-31-05(A)(3) (PTI 04-1358 as issued 9/2/2004	0.05 ton of VOC per year, 5% opacity as a 6 minute average, and see b)(2)w. and b)(2)x.
s.	OAC rule 3745-17-07(B)(1)	See b)(2)e.
t.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
u.	OAC rule 3745-21-09(C)(1)(a)(i)	See b)(2)e.
v.	OAC rule 3745-31-10 thru 20 (PTI 04-1358 as issued 9/2/2004	98% control efficiency for particulate, 0.01 pound per hour of PE, 0.05 ton of PE per rolling, 12-month period, 0.01 pound per hour of PM10, and 0.05 ton of PM10 per rolling 12-month period.
w.	OAC rule 3745-31-21 thru 27 (PTI 04-1358 as issued 9/2/2004	0.01 pound per hour of volatile organic compounds (VOC), and see b)(2)f. through b)(2)h.
x.	40 CFR Part 63 Subpart A (40 CFR 63 .1 through 63.16)	See b)(2)k.
y.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176) 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)l. [63.3091(a) and (b)]
14.0 mmBtu/hour natural gas fired regenerative thermal oxidizer shared by K301 and K303 (combined combustion emissions)		
z.	OAC rule 3745-31-05(A)(3) (as effective 11/30/01) (P0108955 effective 11/16/2011)	1.16 pounds of CO per hour, 5.11 tons of CO per year, 1.19 pounds of nitrogen oxides (NOx) per hour, 5.24 tons of NOx per year, 0.03 pound of PE per hour, 0.13 ton of PE per year, 0.11 pound of PM10 per hour, 0.50 ton of PM10 per year, 0.019 pound of SO2 per hour,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.093 ton of SO ₂ per year, 0.084 pound of VOC per hour, 0.037 ton of VOC per year, 5% opacity as a 6 minute average, and see b)(2)n. and b)(2)y.
aa.	OAC rule 3745-31-05(A)(3)(a)ii (as effective 12/01/06) (P0108955 effective 11/16/2011)	See b)(2)aa.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 27, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart IIII.
- b. The hourly VOC emission limitation above was established for PTI purposes to reflect the controlled potential to emit for this emissions unit based on the worst case operating scenario (82 jobs/hour). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- c. The permittee shall operate and maintain a thermal oxidizer, with a 100% capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the E-coat dip tank and e-coat oven. The thermal oxidizer shall be installed, operated and maintained in accordance with the manufacturer's recommendations with any amendments deemed necessary by the permittee.
- d. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the oxidizer 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.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- f. The maximum coating usage in the dip tank, drying oven and touch up booth operations associated with the E-coat line shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$2.1 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i, gallons of applied coating solids



VOC_i = the mass of VOC (emitted) per volume of coating material i , pounds per gallon of applied coating solids.

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

- g. The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line shall not exceed 0.04 pound of volatile organic compounds per gallon of applied coating solids as a volume-weighted average on a monthly basis.
- h. The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line (K301), shall not exceed 2.1 tons as a rolling, 12-month summation.
- i. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- j. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- k. 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.
- l. 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 1.32 kg/liter (1.10 lb/gal)



of coating solids deposited during each month, determined according to the requirements in 63.3171.

- m. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rules 3745-31-10 thru 27, 40 CFR Part 63, Subpart A and 40 CFR Part 63, Subpart DDDDD.
- n. The hourly and annual emission limitations above 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.
- o. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- p. OAC rule 3745-18-06(A) does not establish sulfur dioxide 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 emissions 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.

- q. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, and a facility-wide maximum annual fuel oil usage rate of 250,000 gallons, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- r. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:



- i. 36.40 tons of CO per rolling, 12-month period, and
- ii. 9.19 tons of SO₂ per rolling, 12-month period.
- s. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period,
 - ii. 1.09 tons of PE per rolling, 12-month period, and
 - iii. 3.65 tons of PM₁₀ per rolling, 12-month period.
- t. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period, and
 - ii. 2.36 tons of VOC per rolling, 12-month period.
- u. 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.
- v. 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.
- w. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 27 and 40 CFR Part 63 Subparts A and IIII.
- x. The permittee shall permit no visible emissions of fugitive dust from the enclosure serving the touch up booth.
- y. 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.

- z. 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 thermal oxidizer combustion emissions of carbon monoxide (CO), nitrogen oxides (NO_x), particulate (PE), particulate matter less than or equal to 10 microns in diameter (PM₁₀), sulfur dioxide (SO₂), and volatile organic compound (VOC) from this air contaminant source since the uncontrolled potential to emit for CO, NO_x, PE, PM₁₀, PM_{2.5}, SO₂, and VOC is less than 10 tons per year.

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) All of the operations comprising this emissions unit shall be fully enclosed and the emissions from the E-coat tank and the drying oven shall be exhausted through a thermal oxidizer.

- (4) The permittee shall operate the thermal oxidizer whenever the respective emission source is in operation.

- (5) All of the equipment comprising the touch up booth shall be fully enclosed and all emissions shall be exhausted through a dry filtration device.

- (6) The permittee shall operate the dry filtration system whenever the respective emission source is in operation.

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

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

- (9) 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 maintain daily records that document any periods when the dry filtration system was not in service when this emissions unit was in operation.
- (3) The permittee shall operate and maintain (a) continuous temperature monitor(s) and recorder(s) which measures and records the combustion temperature within the thermal oxidizer when the oxidizer is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any amendments deemed necessary by the permittee and approved by the Toledo Division of Environmental Services.
- (4) The permittee shall collect and record the following information for each month for the e-coat dip tank, e-coat oven, touch up booth and the associated control equipment:
 - a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per unit 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 (in mass of VOC per volume of applied coating solids) or 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 (i) either the maximum VOC content or the monthly volume-weighted VOC content recorded in accordance with c. above 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 total VOC emissions from all coatings utilized in the dip tank, drying oven and touch up booth operations associated with the E-coat line, $\sum_{i=1}^n(Q_i)(VOC_i) \div 2000$ pounds/ton), in tons per month;
 - f. the rolling, 12-month summation of VOC emissions from the dip tank, drying oven and touch up booth operations associated with the E-coat line, in tons per year.
 - g. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;



- h. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than fifty degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - (5) The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months of operation after issuance of this permit
 - (6) See 40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398).
 - (7) See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176).
 - (8) See 40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 through 63.7575).
- e) Reporting Requirements
- (1) The permittee shall notify the Director of any record showing that the volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 30 days after the exceedance occurs.
 - (2) 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.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify each day when the dry filtration system was not in service.
 - (4) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - (5) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month of the calendar quarter during which the calculated, controlled VOC emission rate, in pounds mass of VOC per gallon volume of applied coating solids, exceeded the emissions limitation and the actual VOC emission rate for each such period.
 - (6) The quarterly deviation (excursion) 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 (40 CFR 60.390 through 60.398).
 - (9) See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176).
 - (10) See 40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 through 63.7575).



f) Testing Requirements

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:

(1) Compliance with the emission limitation(s) for the coating emissions shall be determined in accordance with the following methods(s):

a. Emission Limitation:

0.27 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.0033 pound VOC/job). If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10.

b. Emission Limitation:

1.2 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the maximum hourly emissions rate (0.27 pound of VOC per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

c. Emission Limitation:

The combined emissions of VOC from the E-coat line shall not exceed 0.04 pound of volatile organic compounds per gallon of applied coating solids as a volume-weighted average on a monthly basis.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use



formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

The combined emissions of VOC from the dip tank, drying oven and touch up booth operations associated with the E-coat line (K301), shall not exceed 2.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

100% capture efficiency and a minimum of 95 percent control efficiency

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR Part 60 Appendix A and Method 204 of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternate if such approval does not contravene any other applicable requirement.)

(2) Compliance with the emission limitation(s) for the E-Coat oven burner combustion emissions shall be determined in accordance with the following methods(s):

a. Emission Limitation;

5% opacity, as a six-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:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A.

c. Emission Limitation:

1.2 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A.

d. Emission Limitation:

5.1 tons of CO per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners and 8760 hours per year, and then dividing by 2000 pounds per ton.

e. Emission Limitation:

0.085 pound of NOx per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations 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 50 pounds of NO_x emissions 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 through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A.

f. Emission Limitation:

1.2 pounds of NO_x per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A.

g. Emission Limitation:

5.3 tons of NO_x per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners and 8760 hours per year, and then dividing by 2000 pounds per ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9).



i. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the 14.05 mmBtu heat input capacity of the E-coat oven burners.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9).

j. Emission Limitation:

0.12 ton of PE per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the 14.05 mmBtu heat input capacity of the E-coat oven burners by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

k. Emission Limitation:

0.0075 pound of PM10 per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 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.

l. Emission Limitation:

0.11 pound of PM10 per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by 14.05 mmBtu heat input capacity of the E-coat oven burners.

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.

m. Emission Limitation:

0.46 ton of PM10 per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the 14.05 mmBtu heat input capacity of the E-coat oven burners by the allowable emission limitation (0.0075 pound of PM10 per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

n. Emission Limitation:

0.0006 pound of SO2 per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 0.6 pounds of SO2 emissions 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 through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

o. Emission Limitation:

0.009 pound of SO2 per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO2 per mmBtu) by the 14.05 mmBtu/hour heat input capacity of the E-coat oven burners.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

p. Emission Limitation:

0.04 ton of SO₂ per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the hourly maximum heat input (14.05 mmBtu/hour) by the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

q. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:

36.40 tons of CO as a rolling, 12-month summation

37.89 tons of NO_x as a rolling, 12-month summation

1.09 tons of PE as a rolling, 12-month summation

3.65 tons of PM₁₀ as a rolling, 12-month summation

9.19 tons of SO₂ as a rolling, 12 month summation

2.36 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section B.2. of this permit.

(3) Compliance with the emission limitation(s) for the touch up booth shall be determined in accordance with the following method(s):

a. Emission Limitation;

5% opacity, as a six-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;

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3).

- c. Emission Limitation:

98% control of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through emissions testing at the inlet and outlet of the control device performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate USEPA approved test methods may be used with prior written approval.

- d. Emissions Limitation:

0.01 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A.

- e. Emission Limitation:

0.05 ton of PE per rolling 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for this emissions unit, as follows:

$$(625 \text{ gallons of coating applied per rolling, 12-month period})(15.0 \text{ pounds per gallon of coating})(80\% \text{ solids by weight})(1 - 35\% \text{ transfer efficiency})] (1 - 0.98 \text{ overall control efficiency}) \div 2000 \text{ pounds per ton} = 0.05 \text{ ton of PE per rolling, 12-month period.}$$

- f. Emission Limitation:

0.01 pound of PM10 per hour.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods and procedures of 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.

g. Emission Limitation:

0.05 ton of PM10 per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for this emissions unit, as follows:

$(625 \text{ gallons of coating applied per rolling, 12-month period})(15.0 \text{ pounds per gallon of coating})(80\% \text{ solids by weight})(1 - 35\% \text{ transfer efficiency})] (1-0.98 \text{ overall control efficiency}) \div 2000 \text{ pounds per ton} = 0.05 \text{ ton of PM10 per rolling 12-month period.}$

h. Emissions Limitation:

0.01 pound of VOC per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 25 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.

i. 0.05 ton of VOC per rolling 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable emission limitation (0.01 pound of VOC per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation in accordance with 40 CFR Part 60, Subpart MM:

0.17 kilogram of VOC per liter of applied coating solids when R_T is 0.16 or greater, $0.17 \times 350(0.160 - R_T)$ kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160 and when R_T is less than 0.040, there is no emission limit



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 60.393 through 60.396. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

k. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

l. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

(4) Compliance with the combined emission limitation(s) for the thermal oxidizer combustion emissions shall be determined in accordance with the following methods(s):

- a. Emission Limitation;
5% opacity, as a six-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:
1.16 pounds of CO per hour



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A.

c. Emission Limitation:

5.11 tons of CO per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.16 pounds of CO per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

d. Emission Limitation:

1.19 pounds of NOx per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A.

e. Emission Limitation:

5.24 tons of NOx per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.19 pounds of NOx per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

f. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9).



- g. 0.13 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.03 pound of PE per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

- h. Emission Limitation:

0.11 pound of PM10 per hour

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.

- i. Emission Limitation:

0.55 ton of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.11 pound of PM10 per hour) by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

- j. Emission Limitation:

0.019 pound of SO2 per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

- k. Emission Limitation:

0.093 ton of SO2 per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the allowable emission limitation (0.019 pound of SO2 per hour) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.



I. Emission Limitation:

0.084 pound of VOC per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A.

m. Emission Limitation:

0.37 ton of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the allowable emission limitation (0.084 pound of VOC per hour) and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 pounds/ton.

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

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

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

g) Miscellaneous Requirements

(1) Should any coating formulations cause an 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. K302, Powder Anti-Chip

Operations, Property and/or Equipment Description:

Electrostatic powder anti-chip primer surfacer with inherent control by particulate filtration for overspray, discharging within building

- 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 primer spray booth with inherent control by high efficiency particulate filtration system		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 9/2/04)	0.01 pound per hour of particulate emissions (PE), 0.01 pound per hour of PM10, 5% opacity as a 6-minute average from any stack serving this emissions unit, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-10 thru 20 (PTI 04-01358 issued 9/2/04)	98% control efficiency for particulate, 0.05 ton of PE per rolling, 12-month period, 0.05 ton of PM10 per rolling, 12-month period, and see b)(2)c.
c.	OAC rule 3745-17-07(B)(1)	see b)(2)d.
d.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.
e.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)f.
f.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-	see b)(2)g. [63.3091(a) and (b)]



	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.	
Electrostatic powder anti-chip oven with no control		
g.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 9/2/04)	1.7 pounds per hour of volatile organic compounds (VOC), and see b)(2)h. and b)(2)i.
h.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 issued 9/2/04)	0.05 pound of VOC per gallon of applied coating solids as a monthly volume-weighted average, 2.0 tons of VOC per rolling, 12-month period, and see b)(2)j.
i.	OAC rule 3745-21-09(C)(1)(b)	see b)(2)d.
j.	40 CFR Part 60, Subpart A (60.1 through 60.19)	see b)(2)k.
k.	40 CFR Part 60 Subpart MM (60.390 through 60.398) 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 limitations/control measures specified in this section.	see b)(2)d. [60.392(b)]
l.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)f.
m.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or 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)g. [63.3091(a) and (b)]



Draft Permit-to-Install

Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

14.05 mmBtu per hour direct fired natural gas low NOx anti-chip oven burners		
n.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 1/31/08)	the emissions from the oven stack(s) serving this emissions unit shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu, 1.2 pounds of CO per hour, 5.1 tons of CO per year, 1.2 pounds of nitrogen oxides (NOx) per hour, 5.23 tons of NOx per year, 0.03 pound of PE per hour, 0.13 ton of PE per year, 0.11 pound of PM10 per hour, 0.46 ton of PM10 per year, 0.0006 pound of SO2 per mmBtu, 0.009 pound of SO2 per hour, 0.04 ton of SO2 per year, 0.08 pound of VOC per hour, 0.33 ton of VOC per year, 5% opacity as a 6-minute average, and see b)(2)l. and m.
o.	OAC rule 3745-31-05(D) (PTI 04-01358 issued 9/2/04)	see b)(2)n. and b)(2)o.
p.	OAC rule 3745-31-10 thru 20 (PTI 04-01358 issued 9/2/04)	the emissions from the oven stack(s) serving this emissions unit shall not exceed: 0.085 pound of NOx per mmBtu, 0.0019 pound of PE per mmBtu, 0.0075 pound of PM10 per mmBtu, and see b)(2)n. and b)(2)p.
q.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 issued 9/2/04)	the emissions from the oven stack(s) serving this emissions unit shall not exceed: 0.085 pound of NOx per mmBtu, 0.0054 pound of VOC per mmBtu, and see b)(2)n. and b)(2)q.
r.	OAC rule 3745-17-07(A)(1)	see b)(2)d.



s.	OAC rule 3745-17-11(B)(1)	see b)(2)r.
t.	OAC rule 3745-18-06(A)	see b)(2)s.
u.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)t.
v.	40 CFR Part 63 Subpart DDDDD (63.7480 through 63.7575) In accordance with 40 CFR 63.7485, this emissions unit is a 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). see b)(2)u.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 20, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart IIII.
- b. There shall be no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. These emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions while utilizing an inherent fabric filtration system. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- 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 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).
- 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 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 1.32 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

- h. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 thru 27, 40 CFR Part 60 Subpart A, 40 CFR Part 60 Subpart MM, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart IIII.
- i. The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- j. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$2.0 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i , gallons of applied coating solids
 VOC_i = the mass of VOC (emitted) per volume of coating material i , pounds per gallon of applied coating solids.

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



- I. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 thru 27, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart DDDDD.
- m. 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.
- n. These annual combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, and a facility-wide maximum annual fuel oil usage rate of 250,000 gallons, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- o. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 36.40 tons of CO per rolling, 12-month period, and
 - ii. 9.19 tons of SO₂ per rolling, 12-month period.
- p. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period,
 - ii. 1.09 tons of PE per rolling, 12-month period, and
 - iii. 3.65 tons of PM₁₀ per rolling, 12-month period.
- q. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period, and
 - ii. 2.36 tons of VOC per rolling, 12-month period.
- r. For purposes of this applicable regulation, the weights of gaseous fuels and combustion air are not considered to be part of the weight of materials introduced to a process. Table I of the Appendix to OAC rule 3745-17-11 does not establish a particulate emission limitation for a process weight rate of zero.
- s. OAC rule 3745-18-06(A) does not establish sulfur dioxide 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 emissions 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.

- t. 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.
- u. 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 60, Subpart MM (60.390 through 60.398).
- (4) See 40 CFR Part 63, Subpart IIII (63.3080 through 63.3176).
- (5) 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, 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 company identification of each coating utilized; and
 - b. the mass of VOC emitted per volume of coating solids applied of each coating.

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

- (3) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:
 - a. the company identification for each coating utilized;
 - b. the volume of each coating applied during the month, Q_i , in gallons of applied coating solids;
 - c. the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon of applied coating solids;
 - d. the total VOC emissions from all coatings utilized, in tons; $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$ pounds/ton), in tons per month;
 - e. the rolling, 12-month summation of VOC emissions, in tons per year.

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

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



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 (Toledo Division of Environmental Services) of any daily record showing that the use of noncomplying coatings (any coating with VOC emissions greater than 0.05 pound per gallon of applied coating solids). The notification shall include a copy of such record and shall be sent to the Director within thirty days following the end of the calendar month.
- (3) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e., $(\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 2.0$ tons in any rolling, 12-month period.
- (4) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (5) 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.
- (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).

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. Compliance with the emission limitation(s) for the powder spray booth stack shall be determined in accordance with the following methods(s):
 - i. Emission Limitation:

5% opacity, as a six-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). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.



- ii. Emission Limitation;

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- iii. Emission Limitation:

98% control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system).

Applicable Compliance Method:

If required, compliance shall be determined with the test methods and procedures specified in 3745-17-03(B)(10), or an alternative test protocol or demonstration approved by the Ohio EPA.

- iv. Emission Limitation:

0.01 pound of PE per hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1- 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- v. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable emission limitation (0.01 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.



vi. Emission Limitation:

0.01 pound per hour PM10.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods and procedures of 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.

vii. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable emission limitation (0.01 pound of PM10 per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

b. Compliance with the emission limitation(s) for the oven stack shall be determined in accordance with the following methods(s):

i. Emission Limitation:

0.05 pound of VOC per gallon of applied coating solids as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2)b. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

ii. Emission Limitation:

1.7 pounds per hour VOC.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a one-time calculation of the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.02 pound VOC/job).



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

iii. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3)e. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

iv. Emission Limitation in accordance with OAC rule 3745-21-09(C)(1)(b):

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

Applicable Compliance Method:

If required, the permittee shall use the procedures in OAC rule 3745-21-09(B)(3)(f) for determining the monthly volume-weighted average mass of VOC emitted per volume of coatings. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

v. Emission Limitation in accordance with 40 CFR Part 60, Subpart MM:

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:

If required, 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, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

vi. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- vii. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- c. Compliance with the emission limitation(s) for the oven burners shall be determined in accordance with the following methods(s):

- i. Emission Limitation:

5% opacity, as a six-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). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- ii. Emission Limitation:

0.083 pound of CO per mmBtu.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

- iii. Emission Limitation:

1.2 pounds of CO per hour.



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

iv. Emission Limitation:

5.1 tons of CO per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

v. Emission Limitation:

0.085 pound of NOx per mmBtu.

Applicable Compliance Method:

Compliance shall be determined through calculations 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 50 pounds of NOx emissions per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

vi. Emission Limitation:

1.2 pounds of NOx per hour.



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

vii. Emission Limitation:

5.23 tons of NO_x per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

viii. Emissions Limitation:

0.0019 pound of PE per mmBtu.

Applicable Compliance Method:

Compliance shall be determined through 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 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10), or other USEPA approved test method, with prior approval from the Ohio EPA.

ix. Emission Limitation:

0.03 pound of PE per hour.



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

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

x. Emission Limitation:

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

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.03 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xi. Emission Limitation:

0.0075 pound of PM10 per mmBtu.

Applicable Compliance Method:

Compliance shall be determined through 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 7.5 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods and procedures of 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.

xii. Emission Limitation:

0.11 pound of PM10 per hour.



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

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.

xiii. Emission Limitation:

0.46 ton of PM10 per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xiv. Emission Limitation:

0.0006 pound of SO2 per mmBtu.

Applicable Compliance Method:

Compliance shall be determined through 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 0.6 pounds of SO2 emissions per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04 or other USEPA approved test methods, with prior approval from the Ohio EPA.

xv. Emission Limitation:

0.009 pound of SO2 per hour.



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04, or other USEPA approved test method, with prior approval from the Ohio EPA.

xvi. Emission Limitation:

0.04 ton of SO₂ per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

xvii. Emission Limitation:

0.0054 pound per mmBtu VOC.

Applicable Compliance Method:

Compliance shall be determined through 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 5.5 pounds of VOC per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10, or other USEPA approved test method, with prior approval from the Ohio EPA.

xviii. Emission Limitation:

0.08 pound of VOC per hour.



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (14.05 mmBtu per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10, or other USEPA approved test method, with prior approval from the Ohio EPA.

xix. Emission Limitation:

0.33 ton of VOC per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound per mmBtu VOC) by the maximum heat input of the burners (14.05 mmBtu per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g) Miscellaneous Requirements

- (1) Should any coating formulations cause an 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. K303, Topcoat

Operations, Property and/or Equipment Description:

2 automotive topcoat booths w/ water wash filtration, using waterborne basecoat and solventborne clearcoat with regenerative thermal oxidizer (RTO) on heated flashoff, clearcoat booths and ovens

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
	2 automotive topcoat booths and associated operations with control by water wash filtration for spray painting operations and use of a regenerative thermal oxidizer (RTO) for basecoat heated flash, clearcoat bells and topcoat ovens (process emissions)	
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 9/2/2004)	Combined emissions from the paint booth stacks shall not exceed 30 pounds per hour of particulate matter equal to or less than 10 microns in diameter (PM10), combined emissions from the paint booth and curing oven stacks shall not exceed 247 pounds of volatile organic compounds (VOC) per hour, and see b)(2)a. through b)(2)g.
b.	OAC rule 3745-31-10 thru 20 (PTI 04-01358 as issued 9/2/2004)	Combined emissions from the paint booth stacks shall not exceed 4.8 pounds per hour of particulate emissions (PE), and see b)(2)h. through b)(2)j.
c.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 as issued 9/2/2004)	See b)(2)k. and b)(2)m.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)n.
e.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).
f.	OAC rule 3745-21-09(C)(1)(c)	Combined emissions from the paint booth and curing oven stacks shall not exceed 2.8 pounds of VOC per gallon of coating,



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Chrysler Group LLC- Wrangler Paint Facility

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids. See b)(2)n.
g.	40 CFR Part 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)o.
h.	40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398) In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant topcoat operation subject to the emission limitations/control measures specified in this section.	See b)(2)n. and b)(2)p.
i.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)q.
j.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176) 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)r. [63.3091(a) and (b)]
16.24 mmBtu/hour indirect fired, low NOx, natural gas clearcoat oven burners (combustion emissions)		
k.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 9/2/2004)	Combined emissions from the stack(s) associated with the oven combustion gases shall not exceed: 0.083 pound carbon monoxide (CO) per mmBtu, 1.4 pounds of CO per hour, 6 tons of CO per year, 1.4 pounds of nitrogen oxides (NOx) per hour, 6 tons of NOx per year, 0.03 pound of PE per hour, 0.14 ton of PE per year, 0.12 pound of PM10 per hour, 0.53 ton of PM10 per year,



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		0.0006 pound of sulfur dioxide (SO ₂) per mmBtu, 0.009 pound of SO ₂ per hour, 0.042 ton of SO ₂ per year, 0.09 pound of VOC per hour, 0.40 ton of VOC per year, and see b)(2)s. and b)(2)t.
l.	OAC rule 3745-31-05(D) (PTI 04-01358 as issued 9/2/2004)	See b)(2)u. and b)(2)v.
m.	OAC rule 3745-31-10 thru 20 (PTI 04-01358 as issued 9/2/2004)	0.085 pound NO _x per mmBtu, 0.0019 pound PE per mmBtu, 0.0075 pound of PM ₁₀ per mmBtu, and see b)(2)u. and b)(2)w.
n.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 as issued 9/2/2004)	0.085 pound NO _x per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)u. and b)(2)x.
o.	OAC rule 3745-17-07(A)(1)	See b)(2)n.
p.	OAC rule 3745-17-10(B)(1)	See b)(2)n.
q.	OAC rule 3745-18-06(A)	See b)(2)y.
r.	40 CFR Part 63 Subpart A	See b)(2)z.
s.	40 CFR Part 63 Subpart DDDDD (63.7480 through 63.7575) In accordance with 40 CFR 63.7485, this emissions unit is a process heater located at a facility which is a major source of hazardous air pollutants (HAPs) 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) See b)(2)aa.
14.0 mmBtu/hour natural gas fired regenerative thermal oxidizer shared by K301 and K303 (combined combustion emissions)		
t.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (P0108955 as issued 11/16/2011)	1.16 pounds of CO per hour, 5.11 tons of CO per year, 1.19 pounds of NO _x per hour, 5.24 tons of NO _x per year, 0.03 pound of PE per hour, 0.13 ton of PE per year, 0.11 pound of PM ₁₀ per hour, 0.50 ton of PM ₁₀ per year, 0.019 pound of SO ₂ per hour, 0.093 ton of SO ₂ per year, 0.084 pound of VOC per hour, 0.037 ton of VOC per year,



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		5% opacity as a 6 minute average, and see b)(2)t. and b)(2)bb.
u.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/1/06 (P0108955 as issued 11/16/2011)	See b)(2)cc.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 27, 40 CFR Part 60 Subpart MM, and 40 CFR Part 63 Subpart IIII.
- b. The permittee shall allow no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. Visible particulate emissions from any stack serving the topcoat booths and associated operations shall not exceed 5% opacity as a 6-minute average.
- d. The hourly PE and VOC emission limitations above were established for PTI purposes to reflect the controlled potential to emit for this emissions unit based on the worst case operating scenario (82 jobs/hour). Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- e. The permittee shall operate and maintain a water wash system(s) to control particulate emissions from each spray booth operation. The water wash system(s) shall be installed, operated and maintained in accordance with the manufacturer's recommendations with any amendments deemed necessary by the permittee.
- f. The permittee shall operate and maintain a thermal oxidizer, with a 100% capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the sections of the coating line identified as the basecoat heated flash, clearcoat bells and topcoat ovens. The thermal oxidizer shall be installed, operated and maintained in accordance with the manufacturer's recommendations with any amendments deemed necessary by the permittee.
- g. The average combustion temperature within any thermal oxidizer, for any 3-hour block of time when the oxidizer 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.
- h. The emissions of PM10 from any stack serving the coating operations shall not exceed 0.0015 grain per dry standard cubic foot (gr/dscf) of exhaust gases.



- i. The combined emissions of PE from the coating operations shall not exceed 21 tons as a rolling, 12-month summation.

The hourly and annual PE emission limitations were established for PTI purposes to reflect the controlled potential to emit for this emissions unit. Therefore, provided the water wash system is operated and maintained properly, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

- j. The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 36.01 tons of PM10 per rolling, 12-month period.

The annual PM10 emissions limitation represents the controlled potential to emit of K404 and K405 (0.62 ton of PM10 per year each) added to the controlled potential to emit of K303 at a maximum particulate concentration of 0.0015 grain (gr) of PM10 per dry standard cubic foot of exhaust gases (dscf) and a maximum volumetric flow rate of 617,000 dry standard cubic feet per minute (dscfm) of exhaust. Therefore, provided that the grain loading and volumetric flow limitations of K303 are satisfied, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

- k. The combined emissions of VOC from the paint booth stacks and curing oven stacks (the non-combustion sources) associated with this emissions unit shall not exceed 5.42 pounds of volatile organic compounds per gallon of applied coating solids as a volume-weighted daily average.

- l. The combined emissions from the operation of the non-combustion sources of this emissions unit shall not exceed 300.6 tons of VOC per rolling, 12-month period.

- m. The maximum coating usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$300.6 \text{ tons VOC} \geq (1 - \mu) \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i , gallons of applied coating solids

VOC_i = the mass of VOC (emitted) per volume of coating material i , pounds per gallon of applied coating solids.

μ = the overall capture and control efficiency for the control equipment stated as a decimal fraction

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



- n. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- o. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- p. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- q. 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.
- r. 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.
- s. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-10 thru 27, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart DDDDD.
- t. 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.



- u. The combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, and a facility-wide maximum annual fuel oil usage rate of 250,000 gallons, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- v. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 36.40 tons of CO per rolling, 12-month period; and
 - ii. 9.19 tons of SO₂ per rolling, 12-month period.
- w. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period,
 - ii. 1.09 tons of PE per rolling, 12-month period, and
 - iii. 3.65 tons of PM₁₀ per rolling, 12-month period
- x. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period, and
 - ii. 2.36 tons of VOC per rolling, 12-month period.
- y. 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.

- z. 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.
- aa. 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.
- bb. 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.
- cc. 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 thermal oxidizer combustion emissions of carbon monoxide (CO), nitrogen oxides (NOx), particulate (PE), particulate matter less than or equal to 10 microns in diameter (PM10), sulfur dioxide (SO2), and volatile organic compound (VOC) 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.

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) Each spray booth operation comprising this emissions unit shall be enclosed and all of the particulate emissions shall be exhausted through a water wash system.
- (4) The permittee shall operate the water wash system whenever the respective emission source is in operation.
- (5) The installed exhaust rate from all coating operations comprising K303 shall not exceed a volumetric flow rate of 617,000 dry standard cubic feet per minute (dscfm).
- (6) See 40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398).
- (7) See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176).

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 maintain daily records that document any periods when the water wash system was not in service when this emissions unit was in operation.
- (3) The permittee shall operate and maintain a continuous temperature monitor(s) and recorder(s) which measures and records the combustion temperature within each thermal oxidizer when the oxidizer is in operation. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor(s) and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any amendments deemed necessary by the permittee and approved by the Toledo Division of Environmental Services.
- (4) Pursuant to OAC rule 3745-21-09(C)(4), the permittee shall maintain records for the top coat process that will enable the permittee to calculate the VOC emission rate in order to demonstrate compliance with the emissions limitation identified in b)(1) above for the topcoat process in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018, Dec.1988) and any subsequent revisions thereof. The permittee shall calculate the VOC emission rates for the topcoat operation in pounds of VOC per gallon of solids applied, using the overall capture and control efficiency for the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.



- (5) For purposes of compliance with the annual maximum coating utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:
- a. the company identification for each coating utilized;
 - b. the volume of each coating applied during the month, Q_i , in gallons of applied coating solids;
 - c. the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon of applied coating solids;
 - d. the total VOC emissions from all coatings utilized, in tons; $(1-\mu)\sum_{i=1}^n(Q_i)(VOC_i) \div 2000$ pounds/ton, in tons per month;
 - e. the rolling, 12-month summation of VOC emissions, in tons per year.

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

- (6) The permittee shall perform monthly checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from all stacks 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 emission incident; and
 - e. any corrective actions taken to 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. See 40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398).

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



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 submit quarterly reports which identify any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.
- (3) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within any thermal oxidizer, 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.
- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation for the topcoat process
- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e., $(1-\mu)\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton} > 300.6 \text{ tons}$ in any rolling, 12-month period.
- (6) The permittee shall submit semiannual reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) any corrective actions taken to eliminate the visible particulate emissions.
- (7) The deviation (excursion) 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 (40 CFR 60.390 through 60.398).
- (10) See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation;
5% opacity, as a six-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). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- b. Emission Limitation;

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- c. Emission Limitation:

4.8 pounds of PE per hour

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (pounds/hour)

M = maximum coating solids usage rate (pounds/hour)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



- d. 21 tons of PE per rolling 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the hourly maximum allowable emission limitation (4.8 pounds of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- e. Emission Limitation:

0.0015 gr PM10/dscf

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.

- f. Emission Limitation:

30 pounds of PM10 per hour

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by a one-time calculation based on a worst case operating scenario of the maximum exhaust gas particulate concentration (0.0015 gr/dscf) multiplied by the maximum exhaust gas flow rate (617,000 dscfm) and 60 minutes per hour and then divided by 7000 grains per pound.

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

- g. Emission Limitation:

The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 36.01 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by a one-time calculation based on a worst case operating scenario adding 0.62 ton of PM10 per rolling, 12-month period each for K404 and K405 to the K303 maximum exhaust gas particulate concentration (0.0015 gr/dscf) multiplied by the maximum



exhaust gas flow rate (617,000 dscfm) multiplied by 60 minutes per hour and 8760 hours per year, and divided by 7000 grains per pound and 2000 pounds per ton.

If required, the permittee shall establish compliance through emission testing of K303 for the exhaust gas particulate concentration and the combined exhaust gas flow rate, performed 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.

h. Emission Limitation:

100% capture efficiency and a minimum of 95 percent control efficiency for VOC

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR Part 60 Appendix A and Method 204 of 40 CFR Part 51, Appendix M, using the methods and procedures specified in OAC rule 3745-21-10. The permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternate if such approval does not contravene any other applicable requirement.)

i. Emission Limitation:

5.42 pounds of VOC per gallon of applied coating solids as a volume-weighted daily average.

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements of d)(4) of this permit.

j. Emission Limitation:

247 pounds of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a worst case operating scenario of 82 jobs/hour and a company supplied emissions factor of 3.0 pounds VOC/job.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 or Method 24 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.

k. Emission Limitation:

The combined emissions from the operation of the non-combustion sources of this emissions unit shall not exceed 300.6 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(5)e. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

l. Emission Limitation in accordance with OAC rule 3745-21-09(C)(1)(c):

2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids.

Applicable Compliance Method:

If required, compliance shall be demonstrated utilizing the methods and procedures of OAC rule 3745-21-09(C)(4). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

m. Emission Limitation in accordance with 40 CFR Part 60, Subpart MM:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

n. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.



- o. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- (2) Compliance with the emission limitation(s) for the topcoat oven stacks shall be determined in accordance with the following methods(s):

- a. Emission Limitation;

5% opacity, as a six-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). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

- c. Emission Limitation:

1.4 pounds of CO per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

d. Emission Limitation:

6 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

e. Emission Limitation:

0.085 pound of NOx per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations 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 50 pounds of NOx emissions 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 through emission testing performed in accordance with Methods 1 thru 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.

f. Emission Limitation:

1.4 pounds of NOx per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NOx per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru



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.

g. Emission Limitation:

6 tons of NO_x per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NO_x per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 through emission testing performed in accordance with Methods 1 thru 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.

i. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.



- j. 0.14 ton of PE per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (16.24 mmBtu/hour) by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- k. Emission Limitation:

0.0075 pound of PM10 per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 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.

- l. Emission Limitation:

0.12 pound of PM10 per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour).

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.

- m. Emission Limitation:

0.53 ton of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by the maximum heat input of the



burners (16.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

n. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 0.6 pound of SO₂ emissions 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 through emission testing performed in accordance with Methods 1 thru 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.

o. Emission Limitation:

0.009 pound of SO₂ per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

p. Emission Limitation:

0.042 ton of SO₂ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.



q. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

Compliance shall be determined through 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 5.5 pounds of VOC emissions 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 through emission testing performed in accordance with Methods 1 thru 4 and 25 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.

r. Emission Limitation:

0.09 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 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.

s. Emission Limitation:

0.40 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (16.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

t. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:

36.40 tons of CO as a rolling, 12-month summation

37.89 tons of NOx as a rolling, 12-month summation



- 1.09 tons of PE as a rolling, 12-month summation
- 3.65 tons of PM10 as a rolling, 12-month summation
- 9.19 tons of SO2 as a rolling, 12 month summation
- 2.36 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section B.2. of this permit.

(3) Compliance with the combined emission limitation(s) for the thermal oxidizer combustion emissions shall be determined in accordance with the following methods(s):

a. Emission Limitation;

5% opacity, as a six-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). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

1.16 pounds of CO per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

c. Emission Limitation:

5.11 tons of CO per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.16 pounds of CO per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.



d. Emission Limitation:

1.19 pounds of NOx per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

e. Emission Limitation:

5.24 tons of NOx per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.19 pounds of NOx per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

f. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

g. 0.13 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.03 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

h. Emission Limitation:

0.11 pound of PM10 per hour

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.

i. Emission Limitation:

0.50 ton of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.11 pound of PM10 per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

j. Emission Limitation:

0.019 pound of SO2 per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 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.

k. Emission Limitation:

0.083 ton of SO2 per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the allowable emission limitation (0.019 pound of SO2 per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

l. Emission Limitation:

0.084 pound of VOC per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

m. Emission Limitation:

0.37 ton of VOC per year



Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the potential to emit for this emissions unit. This emission limitation was developed by multiplying the allowable emission limitation (0.084 pound of VOC per hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

- (4) 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 180 days after the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the emission limitations for PM10 from all coating operations.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Ohio EPA.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. 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).
 - f. 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.
 - g. 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



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

- (1) Should any coating formulations cause an 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. P301, Sealer & Adhesive Application

Operations, Property and/or Equipment Description:

Sealer and adhesive application using low volatile organic compound (VOC) materials with control by appropriate work practices

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
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 9/2/04)	40 pounds of volatile organic compounds (VOC) per hour, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 issued 9/2/04)	0.3 pound of VOC per gallon, minus water, on a monthly basis, 47.7 tons of VOC per rolling, 12-month period, and see b)(2)c. and b)(2)d.
c.	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
d.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)e.
e.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or 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. [63.3091(c)]

(2) Additional Terms and Conditions



- a. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-21 thru 27 and 40 CFR Part 63 Subparts A and IIII.
- b. The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- c. The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.
- d. The maximum sealer and adhesive usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$47.7 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

Q_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.

- 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.
- c) Operational Restrictions
 - (1) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).
 - d) Monitoring and/or Recordkeeping Requirements
 - (1) 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, having chosen to demonstrate compliance through the use of compliant coatings, 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.
 - (2) For purposes of compliance with the emissions limitation for sealers and adhesives (0.3 pound of VOC per gallon, minus water, 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.

(3) For purposes of compliance with the rolling, 12-month VOC emissions limitation for sealers and adhesives (47.7 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, Q_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, $\sum_{i=1}^n(Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$; 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.

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



e) Reporting Requirements

- (1) The permittee shall notify the Director of any monthly record showing the use of a sealer or adhesive in this emissions unit that was 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.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the 0.3 pound of VOC per gallon, excluding water, emissions limitation. The notification shall include a copy of such record.
- (3) 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 47.7 tons per rolling, 12-month period.
- (4) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (5) 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.
- (6) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

f) Testing Requirements

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

a. Emission Limitations:

0.3 pound of VOC per gallon, minus water.

Applicable Compliance Method:

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

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.



b. Emission Limitation:

40 pounds of VOC per hour.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.48 pound VOC/job). If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 24 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

47.7 tons of VOC per rolling, 12 month period.

Applicable Compliance Method:

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

d. 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)(1).

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:

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



Draft Permit-to-Install
Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

63.3151. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services..

g) Operational Restrictions

(1) None.



5. P302, Topcoat Purge, Line Cleaning & Booth Cleaning

Operations, Property and/or Equipment Description:

Purge and cleaning solvents with control by appropriate work practices

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
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 9/2/04)	see b)(2)a.
b.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 issued 9/2/04)	160.6 tons of VOC per rolling, 12-month period, and see b)(2)b.
c.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)c.
d.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or 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 63.3094(b) and (c), the permittee shall develop and implement a work practice plan to minimize organic HAP emissions. [63.3082(b)]

(2) Additional Terms and Conditions

a. The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-21 thru 27 and 40 CFR Part 63 Subparts A and IIII.

b. The maximum topcoat purge and cleaning solvents usage shall be limited by the following formula, calculated as a rolling, 12-month summation:



$$160.6 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

Q_i = usage of topcoat purge or cleaning solvent 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.

- c. Table 2 to Subpart IIII of 40 CFR Part 63, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.

c) Operational Restrictions

- (1) The permittee shall employ appropriate work practices, such as minimizing exposure time by proper dispenser and disposal container design, and appropriate cleaning techniques to minimize exposure times.
- (2) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

d) Monitoring and/or Recordkeeping Requirements

- (1) For purposes of compliance with the rolling, 12-month VOC emissions limitation for sealers and adhesives (160.6 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 topcoat purge and cleaning solvent utilized;
 - b. the number of gallons of each topcoat purge and cleaning solvent utilized, Q_i ;
 - c. the volatile organic compound content of each topcoat purge and cleaning solvent utilized, in pounds per gallon, VOC_i ;
 - d. the total VOC emissions from all topcoat purges and cleaning solvents utilized, in tons; $\sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$;
 - 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.

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

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



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all topcoat purges and cleaning solvents utilized in this emissions unit exceed 160.6 tons per rolling, 12-month period.
- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (4) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

f) Testing Requirements

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

160.6 tons of VOC per rolling, 12 month period

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(1).

g) Miscellaneous Requirements

- (1) None.



6. P304, Foam Injection (Deadener)

Operations, Property and/or Equipment Description:

Injected foam sound deadener with control by appropriate work practices

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
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 9/2/04)	emissions of volatile organic compounds (VOC) shall not exceed 6.8 pounds of per hour, and see b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-09(U)(1)(d)	see b)(2)c.
c.	OAC rules 3745-31-21 thru 27 (PTI 04-01358 issued 9/2/04)	emissions of VOC shall not exceed 0.14 pound per gallon of unreacted foam, 8.3 tons of VOC per rolling, 12-month period, and see b)(2)d.
d.	40 CFR Part 63, Subpart A (63.1 through 63.16)	see b)(2)e.
e.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or 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.	Except as otherwise allowed, average organic hazardous air pollutant (HAP) emissions from all deadener materials shall not exceed 0.010 kg/kg (lb/lb) of deadener material used during each month, as determined according to the requirements in 40 CFR 63.3150 through 63.3152. [63.3091(d)]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-21 thru 27 and 40 CFR Part 63, Subparts A and IIII.



- b. The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The maximum foam sound deadening usage at this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$8.3 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

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

- 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.
- c) Operational Restrictions
 - (1) The permittee shall employ techniques appropriate to minimize the emissions of VOC from this emissions unit.
 - d) Monitoring and/or Recordkeeping Requirements
 - (1) For purposes of compliance with the rolling, 12-month VOC emissions limitation (8.3 tons), the permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record on a monthly basis the following information for all foam sound deadener operations:
 - a. the company identification for each unreacted foam sound deadener utilized;
 - b. the number of gallons of each unreacted foam sound deadener utilized, Q_i ;
 - c. the mass of VOC (emitted) per volume of unreacted foam sound deadener material, VOC_i ;
 - d. the total VOC emissions from all foam sound deadener materials utilized, in tons; $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$;
 - 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.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing an exceedance of the 0.14 pound of VOC per gallon, excluding water, emissions limitation. The notification shall include a copy of such record.
- (2) 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 8.3 tons per rolling, 12-month period.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (4) 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.
- (5) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

f) Testing Requirements

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

0.14 pound of volatile organic compounds (VOC) emitted per gallon of unreacted foam

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements d)(1). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.
 - b. Emission Limitation:

6.8 pounds of VOC per hour



Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.083 pound VOC/job). If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 24 of 40 CFR Part 60 Appendix A.

c. Emission Limitation:

8.3 tons of VOC per rolling, 12 month period

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements of d)(1).

d. Emission Limitation for purposes of compliance with OAC rule 3745-21-09(U)(1)(d):

3.5 pound per gallon of unreacted foam, excluding water and exempt solvents

Applicable Compliance Method:

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

e. Emission Limitation:

0.010 kg/kg (lb/lb) HAP.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



7. P305, Topcoat/E-Coat/Anti-Chip Sanding

Operations, Property and/or Equipment Description:

E-coat/Antichip/Topcoat sanding with control by dry filtration

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
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 issued 9/2/04)	Emissions from the stack(s) serving this emissions unit shall not exceed: 1.9 pounds of particulate emissions (PE) per hour, 0.62 pound of particulate matter less than or equal to 10 microns in diameter (PM10) per hour, and see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-10 thru 20 (PTI 04-01358 issued 9/2/04)	see b)(2)d. through b)(2)f.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)g.
d.	OAC rule 3745-17-11(B)(1)	See b)(2)h.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1) and OAC rules 3745-31-10 thru 20.
- b. The permittee shall permit no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average.
- d. The permittee shall install and maintain a dust collection system with a minimum 98% capture and control efficiency for all particulate emissions from all sanding operations comprising this emissions unit.



- e. The combined emissions of particulate (PE) from the sanding operations associated with the E-coat line (K301), the antichip line (K302) and topcoat line (K303) shall not exceed 2.25 tons per rolling, 12-month period.
 - f. The combined emissions of particulate matter equal to or less than ten microns in diameter (PM10) from the sanding operations associated with the E-coat line (K301), the antichip line (K302) and topcoat line (K303) shall not exceed 0.75 ton per rolling, 12-month period.
 - g. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
 - h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) All of the operations comprising this emissions unit shall be enclosed and all emissions shall be exhausted through a dry filtration system.
 - (2) The permittee shall operate the dry filtration system whenever the respective emission source is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records that document any periods when a dust collection system was not in service when the respective emissions source was in operation.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when any dust collection system was not in service when the respective emissions source was in operation.
 - (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- 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. Visible particulate emissions shall not exceed 5% opacity as a 6 minute average from any stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the 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. no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the 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:

1.9 pounds of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745 17 03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- d. 2.25 tons of PE per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for this emissions unit, as follows:

$(1-0.98 \text{ overall control})(0.288 \text{ pound of PE per hour per sanding station})(6 \text{ sanding stations})(8760 \text{ hours per year})(1 \text{ ton per } 2000 \text{ pounds}) = 0.15 \text{ ton of PE per year}$

If required, the permittee shall demonstrate compliance through emission testing for the exhaust gas particulate concentration and the combined exhaust gas flow rate performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745 17 03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services



e. Emission Limitation:

0.62 pound of PM10 per hour

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.

f. Emission Limitation:

The combined emissions of PM10 from the sanding operations associated with the E-coat line (K301), the antichip line (K302) and topcoat line (K303) shall not exceed 0.75 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for this emissions unit, as follows:

$(1-0.98 \text{ overall control})(0.096 \text{ pound of PM10 per hour per sanding station})(6 \text{ sanding stations})(8760 \text{ hours per year})(1 \text{ ton per 2000 pounds}) = 0.05 \text{ ton of PM10 per year}$

If required, the permittee shall establish a site specific emission factor through emission testing performed 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.

g. Emission Limitation:

98% control of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through emissions testing at the inlet and outlet of the control device(s) performed 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.

g) Miscellaneous Requirements

(1) None.



8. Emissions Unit Group -Rapid Reprocess 1 and 2: K404 and K405

EU ID	Operations, Property and/or Equipment Description
K404	Automotive off-line repair booth with dry filtration (SPOVEN)
K405	automotive off-line repair booth with dry filtration (SPOVEN)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Automotive off-line repair booth with dry filtration		
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 1/31/2008)	Emissions from the stack associated with the repair booth shall not exceed: 2.4 tons of particulate emissions (PE) per year, 0.62 ton of particulate matter equal to or less than 10 microns in diameter (PM10) per year, 14.5 tons of volatile organic compounds (VOC) per year, 5% opacity as a 6-minute average, and see b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 thru 20 (PTI 04-01358 as issued 1/31/2008 and PTI 04-1359 as issued 9/2/2004)	Emissions from the stack associated with the repair booth shall not exceed: 0.551 pound PE per hour, 0.0015 grain of PM10 per dry standard cubic foot (gr/dscf), and see b)(2)c. and b)(2)d.
c.	OAC rules 3745-31-21 thru 27 (PTI 04-01358 as issued 1/31/2008)	See b)(2)e. through b)(2)g.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)h.
e.	OAC rule 3745-17-11(C)(3)	Exemption from the requirements of OAC rule 3745-17-11(C)(1) and (C)(2).



Draft Permit-to-Install

Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-09(C)(1)(d)	Emissions from the stack associated with the clean shop repair station shall not exceed 4.8 pounds of VOC per gallon as a daily volume weighted average of coating, excluding water and exempt solvents.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	See b)(2)i.
h.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or 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)j. [63.3091(a) and (b)]
Indirect fired 5 mmBtu natural gas fired infrared oven		
i.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 1/31/2008 and PTI 04-01359 as issued 9/2/2004)	Emissions from the stack associated with the oven combustion gases shall not exceed: 0.083 pound of carbon monoxide (CO) per mmBtu, 1.9 tons of CO per year, 1.9 tons of nitrogen oxides (NOx) per year, 0.05 ton per year of PE, 0.17 ton of PM10 per year, 0.0006 pound of sulfur dioxide (SO2) per mmBtu 0.02 ton of SO2 year, 0.12 ton of VOC per year, and 5% opacity as a 6 minute average, and see b)(2)k. and b)(2)l.
j.	OAC rule 3745-31-05(D)	See b)(2)n. and b)(2)o.
k.	OAC rule 3745-31-10 thru 20 (PTI 04-01359 as issued 9/2/2004)	0.085 pound NOx per mmBtu, 0.0019 pound PE per mmBtu, 0.0075 pound PM10 per mmBtu, and see b)(2)m. and b)(2)n.
l.	OAC rule 3745-31-21 thru 27	0.085 pound NOx per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)m. and b)(2)o.
m.	OAC rule 3745-17-07(A)(1)	See b)(2)g.
n.	OAC rule 3745-17-10(B)(1)	See b)(2)g.



Draft Permit-to-Install

Chrysler Group LLC- Wrangler Paint Facility

Permit Number: P0110183

Facility ID: 0448011731

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
o.	OAC rule 3745-18-06(A)	See b)(2)q.
p.	40 CFR Part 63 Subpart A (63.1 through 63.16)	See b)(2)r.
q.	40 CFR Part 63 Subpart DDDDD (63.7480 through 63.7575) In accordance with 40 CFR 63.7485, this emissions unit is a 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). see b)(2)s.
Sanding station(s)		
r.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 1/31/2008 and PTI 04-01359 as issued 9/2/2004)	Emissions from the stack(s) associated with the sanding station(s) shall not exceed: 2.4 tons of PE per year, 1.85 tons of PM10 per year, 5% opacity as a 6 minute average, and see b)(2)t.
s.	OAC rule 3745-31-10 thru 20 (PTI 04-01359 as issued 9/2/2004)	Emissions from the stack(s) associated with the sanding station(s) shall not exceed: 0.0015 gr/dscf of PM10; and see b)(2)b. through b)(2)d. and b)(2)u.
t.	OAC rule 3745-17-07(A)(1)	See b)(2)g.
u.	OAC rule 3745-17-11(B)(1)	Emissions from the stack associated with the sanding station(s) shall not exceed 0.551 pound of PE per hour.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 27 and 40 CFR Part 63 Subparts A and IIII.
- b. The permittee shall allow no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit.
- c. All of the operations comprising this emissions unit that generate particulate emissions shall be enclosed and all particulate emissions shall be exhausted through a particulate control system providing a minimum 98% overall control efficiency.



- d. The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 36.01 tons of PM10 per rolling, 12-month period.

The annual PM10 emissions limitation represents the controlled potential to emit of K404 and K405 (0.62 ton of PM10 per year each) added to the controlled potential to emit of K303 at a maximum particulate concentration of 0.0015 grain (gr) of PM10 per dry standard cubic foot of exhaust gases (dscf) and a maximum volumetric flow rate of 617,000 dry standard cubic feet per minute (dscfm) of exhaust. Therefore, provided that the grain loading and volumetric flow limitations of K303 are satisfied, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

- e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(C)(1)(d).
- f. The combined emissions from the operation of emissions units K404 and K405 shall not exceed 15.0 tons of VOC per rolling, 12-month period.
- g. The maximum combined coating usage in this emissions units K404 and K405 shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$15.0 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}$$

Where:

Q_i = usage of coating material i, gallons

VOC_i = the mass of VOC (emitted) per volume of coating material i, pounds per gallon.

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

- k. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rules 3745-31-10 thru 27 and 40 CFR Part 63 Subpart DDDDD.
- l. 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.
- m. The combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, and a facility-wide maximum annual fuel oil usage rate of 250,000 gallons, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- n. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 36.40 tons of CO per rolling, 12-month period; and
 - ii. 9.19 tons of SO₂ per rolling, 12-month period.
- o. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
 - i. 37.89 tons of NO_x per rolling, 12-month period,
 - ii. 1.09 tons of PE per rolling, 12-month period, and
 - iii. 3.65 tons of PM₁₀ per rolling, 12-month period
- p. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, K404 and K405 shall not exceed the following:



- i. 37.89 tons of NO_x per rolling, 12-month period, and
 - ii. 2.36 ton of VOC per rolling, 12-month period.
- q. OAC rule 3745-18-06(A) does not establish sulfur dioxide 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 emissions 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.

- r. 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.
- s. 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.
- t. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1) and OAC rules 3745-31-10 thru 20.
- u. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).



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) All of the operations comprising this emissions unit shall be fully enclosed and all emissions shall be exhausted through a dry filtration system.
- (4) The permittee shall operate the dry filtration system whenever the respective emission source is in operation and shall maintain the dry particulate filter.
- (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 maintain daily records that document any periods when the dry filtration system was not in service when this emissions unit was in operation.
- (3) The permittee may elect to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit. This election shall be made by advance notification to the Director and shall remain in effect on a calendar month basis.
- (4) When compliance is being demonstrated through the use of compliance coatings (i.e., each coating utilized shall comply with the applicable limitation of 4.8 pounds of VOC per gallon as applied), the permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
- (5) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall collect and record the following information each day for this emissions unit:



- a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
- (6) For purposes of compliance with the annual VOC emissions limitation for coating usage in this emissions units (14.5 tons), the permittee shall collect and record on a monthly basis the following information:
- a. the company identification for each coating utilized;
 - b. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;
 - c. the maximum VOC content (excluding water and exempt solvents) of each coating applied; or the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for CVOC,2 above;
 - d. the total VOC emissions from all coatings applied, i.e., the summation of the products of "b" times "c" for all the individual coatings applied during the month; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., "b" times "c" for worst case coating;
 - e. the calendar year summation of VOC emissions, in tons per year.
- Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.
- (7) For purposes of compliance with the annual maximum coating utilization in emissions units K404 and K405, the permittee shall collect and record on a monthly basis the following information:
- a. the company identification for each coating utilized;
 - b. the volume of each coating applied during the month, Q_i , in gallons;
 - c. the mass of VOC (emitted) per volume of each coating applied during the month, VOC_i , in pounds per gallon;
 - d. the total VOC emissions from all coatings utilized, in tons; $\sum_{i=1}^n (Q_i)(VOC_i) \div 2000$ pounds/ton), in tons per month;
 - e. the rolling, 12-month summation of VOC emissions, in tons per year.



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

- (8) The permittee has sufficient existing records to demonstrate compliance with these limitations during the first twelve months of operation after issuance of this permit
- (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).

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 submit quarterly deviation (excursion) reports that identify each day when the dry filtration system was not in service when the respective emissions source was in operation.
- (3) The permittee shall submit advance notification of the election to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit.
- (4) When compliance is being demonstrated through the use of compliance coatings, the permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.
- (5) When compliance is being demonstrated through the use of daily volume weighted average of the materials used in this emissions unit, the permittee shall notify the Director of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director within 45 days after the exceedance occurs.
- (6) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the emissions unit exceeds the annual VOC emissions limitation for all coatings employed (14.5 tons per year).
- (7) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization in emissions units K404 and K405 exceeds the applicable limitation, i.e., $(\sum_{i=1}^n (Q_i)(VOC_i) \div 2000 \text{ pounds/ton}) > 15.0$ tons, in any rolling, 12-month period.
- (8) The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (9) 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.



- (10) See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).
- (11) See 40 CFR Part 63, Subpart DDDDD (63.7480 through 63.7575).

f) Testing Requirements

- (1) Compliance with the emission limitation(s) for the repair booth filter exhaust stack(s) shall be determined in accordance with the following method(s):

- a. Visible particulate emissions shall not exceed 5% opacity as a 6 minute average from any stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- b. no visible emissions of fugitive dust from any enclosure serving the processes comprising this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(3). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- c. Emission Limitation:

0.551 pound of PE per hour

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (pounds/hour)

M = maximum coating solids usage rate (pounds/hour)

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



CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

2.4 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the PE emission limitation (0.551 pound of PE per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emission limitation. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

e. Emission Limitation:

98% control of particulate emissions

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

f. Emission Limitation:

0.0015 gr/dscf PM10

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

g. Emission Limitation:

0.62 ton of PM10 per year



Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation for this emissions unit, as follows:

$(1-98\% \text{ overall control efficiency})[(0.096 \text{ pound PM}_{10} \text{ per station-hour from sanding})(2 \text{ stations})(8760 \text{ hours/year}) + (7700 \text{ gallons per year})(15.0 \text{ pounds per gallon})(80\% \text{ solids content})(1-35\% \text{ transfer efficiency})] \div 2000 \text{ pounds per ton} = 0.62 \text{ ton of PM}_{10} \text{ per year}$

If required, the permittee shall establish a site specific emission factor, in grains per standard cubic foot, in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M and evaluate the site specific volumetric flow in accordance with Methods 1 thru 4 of 40 CFR Part 60 Appendix A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA..

h. Emission Limitation:

4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule(s) 3745-21-09(B)(3)(f) and 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

i. Emission Limitation:

14.5 tons of VOC per year

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

j. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- k. Emission Limitation in accordance with 40 CFR Part 63, Subpart IIII:

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. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- (2) Compliance with the emission limitation(s) for the combustion gas exhaust stack shall be determined in accordance with the following method(s):

- a. 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 40 CFR Part 60, Appendix A, Method 9 using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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



- c. 1.9 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu per hour) by the allowable emission limitation (0.083 pound of CO per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- d. Emission Limitation:

0.085 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance may be determined through calculations 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 50 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

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

- e. 1.9 tons of NO_x per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu per hour) by the allowable emission limitation (0.085 pound of NO_x per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- f. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

Compliance may be determined through 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 Btus per standard cubic foot.



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

- g. 0.05 ton of PE per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu per hour) by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- h. Emission Limitation:

0.0075 pound of PM10 per mmBtu

Applicable Compliance Method:

Compliance may be determined through 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 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btus 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, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

- i. Emission Limitation:

0.17 ton of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu per hour) by the allowable emission limitation (0.0075 pound of PM10 per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.



j. Emission Limitation:

0.0006 pound of SO₂ per mmBtu

Applicable Compliance Method:

Compliance may be determined through 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 0.6 pounds of SO₂ emissions per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

k. Emission Limitation:

0.02 ton of SO₂ per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu per hour by the allowable emission limitation (0.0006 pound of SO₂ per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

l. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

Compliance may be determined through 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 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

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



m. Emission Limitation:

0.12 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (5 mmBtu/hour) by the allowable emission limitation (0.0054 pound of VOC per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

(3) Compliance with the combined emission limitation(s) for this emissions unit shall be determined in accordance with the following method(s):

a. Emission Limitation:

Applicable Compliance Method:

The combined emissions from the coating operations of K303, and all stacks serving K404 and K405 shall not exceed 36.01 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation may be demonstrated by a one-time calculation based on a worst case operating scenario adding 0.62 ton of PM10 per rolling, 12-month period each for K404 and K405 to the K303 maximum exhaust gas particulate concentration (0.0015 gr/dscf) multiplied by the maximum exhaust gas flow rate (617,000 dscfm) multiplied by 60 minutes per hour and 8760 hours per year, and divided by 7000 grains per pound and 2000 pounds per ton.

If required, the permittee shall establish compliance through emission testing of K303 for the exhaust gas particulate concentration and the combined exhaust gas flow rate, performed 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.

b. Emission Limitation:

The combined emissions from the operation of the non-combustion sources of emissions units K404 and K405 shall not exceed 15.0 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

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



c. Emission Limitation:

The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:

- i. 36.40 tons of CO per rolling, 12-month period
- ii. 37.89 tons of NOx per rolling, 12-month period
- iii. 1.09 tons of PE per rolling, 12-month period
- iv. 3.65 tons of PM10 per rolling, 12-month period
- v. 9.19 tons of SO2 per rolling, 12-month period
- vi. 2.36 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section B.2. of this permit.

g) Miscellaneous Requirements

- a) None.