

**X  Synthetic Minor Determination and/or  Netting Determination  
Permit To Install 04-01414**

**A. Source Description**

DaimlerChrysler has requested modification of PTI 04-01102. This PTI was originally issued in 1998 and was subsequently modified in 1999 and 2000. DaimlerChrysler has requested the following modifications to PTI 04-01102.

1. The installed capacity of several pieces of fuel burning equipment (B008-B027 and K021 - K023) were different from what was identified in the original PTI.
2. AP-42 emission factors for fuel burning equipment have been revised (B008-B010 and K021 - K023).
3. Change of emission factors for air make-up heaters to FIRE v6.24 emission factors (B011 - B027).
4. There was a typographical error in the facility-wide emissions limitation under I.A.2. The total PM<sub>10</sub> emissions for the facility in the Summary of Total Permit to Install Allowable Emissions was correct for PM<sub>10</sub> (116.03 tons/yr) in the original PTI, however, there was a typographic error under I.A.2 in the original PTI for PM<sub>10</sub> emissions (64.05 tons/yr).

The total PM<sub>10</sub> has also changed due to revised emission factors.

The permittee has requested the fuel oil terms be removed from fuel burning equipment, the total allowable facility SO<sub>2</sub> emissions have decreased.

As discussed under 10 and 11 below, the permittee has requested that allowable VOC emissions for P008 and P009 be reduced. The total facility allowable emissions have been adjusted to reflect the revised allowable VOC emissions.

5. Emissions units B028 - B031 (natural gas, direct-fired space heaters) were included in the original installation of the facility, but were not included in the original PTI. The permittee has requested FIRE v6.24 emission factors be used for emissions from these units.
6. Since issuance of the original PTI, new MACT rules were promulgated - 40 CFR Part 63, Subparts IIII and DDDDD. These rules have been added as applicable requirements.
7. Addition of (6) closure panel systems for the 2007-2008 model year. Closure panels will be installed with anti-flutter adhesive and a 2-part structural hem adhesive. Adhesive application will be covered under existing emissions unit P008 (sealers and adhesives).
8. A giant sunroof will be a vehicle option for the 2007-2008 model year. The giant sunroof will be installed using urethane adhesive. This adhesive application will be covered under existing emissions unit P008 (sealers and adhesives).
9. A liftgate will be a vehicle option for the 2007-2008 model year. The liftgate fixed glass

will be installed using urethane adhesive and be covered under existing emissions unit P008 (sealers and adhesives).

10. Reduction of emission limitation for P008 (sealers and adhesives) from 140 tons/yr VOC to 55.06 tons/yr VOC. The permittee has requested this reduction to maintain emissions below the major modification threshold.
11. Reduction of emission limitation for P009 (miscellaneous solvents, solvent wipes and plantwide use of non-photochemically reactive solvents) from 96.9 tons/yr VOC to 52.28 tons/yr VOC. The permittee has requested this reduction to maintain emissions below the major modification threshold.
12. Removal of emissions units K025, K026, and K028, since these units were never installed.
13. Removal of the Stage II vehicle fueling requirements, since all vehicles produced are equipped with ORVR control.
14. There are no longer any unpaved roadways, so reference to unpaved roadways was removed.

**B. Facility Emissions and Attainment Status**

The existing facility is a major source for all criteria air pollutants, except for SO<sub>2</sub> and is a major source of HAPs.

<u>Pollutant</u>	<u>Significant Net Emission Increase Levels</u>	<u>Attainment Status</u>
PM <sub>2.5</sub>	15 TPY	attainment
PM <sub>10</sub>	15 TPY	unclassifiable
SO <sub>2</sub>	40 TPY	attainment
VOC	40 TPY	non-attainment
NO <sub>x</sub>	40 TPY	unclassifiable/attainment
CO	100 TPY	unclassifiable/attainment

**C. Applicable Regulations**

OAC rule 3745-31-05(A)(3)	Best available technology
OAC rule 3745-31-05(C)	The permittee has requested federally enforceable restrictions on this emissions unit to avoid major new source review for this modification.
OAC rule 3745-17-07(A)(1)	20% opacity as a 6-minute average, unless otherwise specified by the rule
OAC rule 3745-17-07(B)(4)	VEs from paved roadways shall not exceed 6 minutes in 60 minute period
OAC rule 3745-17-08	reasonably available control measures for control of fugitive dust
OAC rule 3745-17-10	0.020 lb PE/MMBtu
OAC rule 3745-17-11	b/hr PE limitations
OAC rule 3745-18-06(A)	Exemption for burning only natural gas

OAC rule 3745-21-07(B)	Requires LACT which will be met by BAT
OAC rule 3745-21-08(B)	Requires LACT which will be met by BAT
OAC rule 3745-21-09(B)(1)	General provisions of VOC rules
OAC rule 3745-21-09(C)	Surface coating of autos & light duty trucks
OAC rule 3745-21-09(R)	Requirements for gasoline dispensing facilities
OAC rule 3745-23-06(B)	Requires LACT which will be met by BAT
40 CFR Part 60, Subpart MM	NSPS for auto & light duty truck coating operations
40 CFR Part 63, Subpart A	MACT general provisions
40 CFR Part 63, Subpart IIII	MACT for surface coating of autos & light duty trucks
40 CFR Part 63, Subpart DDDDD	MACT for industrial ,commercial & institutional boilers & process heaters

**D. Modified Source Emissions**

	CO	NOx	PM10	SO2	VOC	
B008-B010, K021-K023(lb/mmBtu)	0.0830	.083	0.0056	0.0006	0.0054	AP-42 Tables
1.4-1,2 7/1998						
B011-B031(lb/MMBtu)	0.02	0.1	0.0086	0.0006	0.0052	FIRE v6.24
	(SCC 1-05-001-06)					

Allowable Annual emissions for B008-B03, and fuel burning emissions from K021-K023 = (lb/MMBtu)x(MMBtu/hr)x(8760 hrs/yr)/(2000 lbs/ton)

	MMBtu/hr	CO tons/yr	NOx tons/yr	PM10 tons/yr	SO2 tons/yr	VOC tons/yr
B008	32.66	11.873	11.873	0.801	0.086	0.772
B009	32.66	11.873	11.873	0.801	0.086	0.772
B010	32.66	11.873	11.873	0.801	0.086	0.772
B011	12.02	1.053	5.265	0.453	0.032	0.274
B012	15.03	1.317	6.583	0.566	0.039	0.342
B013	15.03	1.317	6.583	0.566	0.039	0.342
B014	12.02	1.053	5.265	0.453	0.032	0.274
B015	15.03	1.317	6.583	0.566	0.039	0.342
B016	12.02	1.053	5.265	0.453	0.032	0.274
B017	12.02	1.053	5.265	0.453	0.032	0.274
B018	13.53	1.185	5.926	0.510	0.036	0.308
B019	12.02	1.053	5.265	0.453	0.032	0.274
B020	10.52	0.922	4.608	0.396	0.028	0.240
B021	13.53	1.185	5.926	0.510	0.036	0.308
B022	10.52	0.922	4.608	0.396	0.028	0.240
B023	15.03	1.317	6.583	0.566	0.039	0.342
B024	15.03	1.317	6.583	0.566	0.039	0.342
B025	15.03	1.317	6.583	0.566	0.039	0.342
B026	13.53	1.185	5.926	0.510	0.036	0.308
B027	13.53	1.185	5.926	0.510	0.036	0.308
B028	12.02	1.053	5.265	0.453	0.032	0.274
B029	16.53	1.448	7.240	0.623	0.043	0.376
B030	11.03	0.966	4.831	0.415	0.029	0.251

B031	12.02	1.053	5.265	0.453	0.032	0.274
K021	26	9.452	11.388	0.638	0.068	0.615
K022	35.4	12.869	15.505	0.868	0.093	0.837
K023	44.4	16.141	19.447	1.089	0.117	1.050

The following changes to operations affect emissions units P008-P010: addition of (6) closure panel systems for the 2007-2008 model year; add a giant sunroof vehicle option for the 2007-2008 model year; and add a liftgate vehicle option for the 2007-2008 model year. The applicant has requested the following allowable emissions for these emissions units to ensure that there is not a significant net emissions increase:

P008: 55.06 tons  
P009: 52.28 tons  
P010: 5.1 tons

The proposed allowable emission rates for P008, P009 and P010 were based upon the past actual emissions of VOCs for P008 - P010 plus a compliance margin determined by the applicant (which accounts for the added VOC emissions from the proposed sources). Since the sources are existing and the permittee possess actual emissions data, the permittee did not find it necessary to estimate what the VOC emission levels would be based upon worst case VOC content and worst case usage amounts.

**E. Net Emission Increase Analysis**

Emissions Units P008-P010 are affected by the new closure panel installation, giant sunroof installation, and liftgate glass installation. The below analysis demonstrates that these changes do not result in a significant net emissions increase of VOC emissions.

Past actual tons/yr VOC emissions for P008 through P010 for 2002-2003 are:

P008 (sealers&adhesives) 37.71

P009 (misc solvents, body wipes and plantwide non-photochemically reactive solvents) 34.93

P010 (misc solvents - photochemically reactive) 0.81

Future potential VOC emissions for P008 through P010 are:

P008: 55.06 tons

P009: 52.28 tons

P010: 5.1 tons

Net emissions increase = (55.06 + 52.28 + 5.1) - (37.71 + 34.93 + 0.81) = 38.99 tons/yr VOC increase

Since the permittee has requested restrictions on the allowable emissions for P008 and P009, the net emissions increase for this project is less than 40 tons/yr VOC. The permittee has more than 1 year of emissions data indicating that actual emissions are below the facility-wide emission limitation, including emissions data for B028-B031.

**F. Conclusion**

The permittee proposes the following changes: addition (6) closure panel systems for the 2007-2008 model year; add a giant sunroof vehicle option for the 2007-2008 model year; and add a liftgate vehicle option for the 2007-2008 model year. These changes affect emissions

units P008-P010. Since the permittee has requested federally enforceable restrictions on the VOC emission limitations for P008 and P009, these changes result in a synthetic minor increase of VOC emissions of 38.99 tons/yr VOC and is not subject to Nonattainment Area New Source Review.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION**      **CERTIFIED MAIL**  
LUCAS COUNTY  
Application No: 04-01102  
Fac ID: 0448010414

DATE: 7/26/2005

DaimlerChrysler Corp  
Roger Brown  
CIMS 516-04-31 4400 Chrysler Drive  
Toledo, OH 43608

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 3550** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

TDES

Toledo Metro. Area Council of Gov.

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**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 04-01102**

Application Number: **04-01102**  
APS Premise Number: **0448010414**  
Permit Fee: **\$ To be entered upon final issuance**  
Name of Facility: **DaimlerChrysler Corp**  
Person to Contact: **Roger Brown**  
Address: **CIMS 516-04-31 4400 Chrysler Drive  
Toledo, OH 43608**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4400 Chrysler Dr  
Toledo, OHIO**

Description of modification:

**Modification in support of 2007 and 2008 model year vehicles and revision of emission factors for natural gas fired space heaters.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**DaimlerChrysler Corp**

Facility ID: **0448010414**

**PTI Application: 04-01102**

**Modification Issued: To be entered upon final issuance**

## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

### **CONSTRUCTION OF NEW SOURCES**

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

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

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

DaimlerChrysler Corp

Facility ID: 0448010414

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### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **BEST AVAILABLE TECHNOLOGY**

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

### **PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

If 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).

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

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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**DaimlerChrysler Corp**

**PTI Application: 04-01102**

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**DaimlerChrysler Corp**  
**PTI Application: 04-01102**

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **DaimlerChrysler Corp.** located in **Lucas** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA  
Source  
Number

B008

B011

B008  
Cont'd

B009

B009  
Cont'd

B012

B010

**DaimlerChrysler Corp**Facility ID: **0448010414****PTI Application: 04-01102****Modification Issued: To be entered upon final issuance**

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	B015			
B013		B018		B023
	B016		B021	
B014		B019		B024
	B017		B022	
		B020		

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B025

K022

K023

B026

G003

B027

K021

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K024		P008		F001
			P011	
K029				B028
		P009		
			P012	
K027				
				B029
	P007			
		P010		

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	Source Identification Description 32.66 MMBtu/hour natural gas boiler			
B030		32.66 MMBtu/hour natural gas boiler		
			32.66 MMBtu/hour natural gas boiler	12.02 MMBtu/hour air makeup unit, BC ASH 3
B031				15.03 MMBtu/hour air makeup unit, BC ASH 4

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		12.02 MMBtu/hour air makeup unit, BC ASH 6		
			10.52 MMBtu/hour air makeup unit, CC ASH 8	
15.03 MMBtu/hour air makeup unit, BC ASH 5	15.03 MMBtu/hour air makeup unit, BC ASH 11			15.03 MMBtu/hour air makeup unit, CC ASH 15
		13.53 MMBtu/hour air makeup unit, BC ASH 13		
			13.53 MMBtu/hour air makeup unit, CC ASH 9	
	12.02 MMBtu/hour air makeup unit, BC ASH 12			
12.02 MMBtu/hour air makeup unit, BC ASH 10		12.02 MMBtu/hour air makeup unit, CC ASH 7		15.03 MMBtu/hour air makeup unit, CC ASH 16
			10.52 MMBtu/hour air makeup unit, CC ASH 14	

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15.03 MMBtu/hour air makeup unit, Misc No. 1 (F1)	13.53 MMBtu/hour air makeup unit, Misc No. 8 (D)	E-Coat with indirect fired, natural gas drying unit, oven	26.0 MMBtu/hr natural gas drying oven	Topcoat with (2) natural gas infrared flash tunnels and (2) indirect fired, drying ovens at 22.2 MMBtu/hr each
13.53 MMBtu/hour air makeup unit, Misc No. 2 (E1)				

Gasoline  
 Fill Stations

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Low bake repair with Spovens (combination spray booth and electric oven)	Interior touchup	Non-production maintenance materials, spray booth cleaning and purge  Sealers and adhesives	Miscellaneous solvents, plantwide use of photo-chemically reactive solvents  BIW Inspection and Grinding	Roadways and parking areas       12.02 MMBtu/hour natural gas, direct fired air makeup unit, ASH E
Blackout		Miscellaneous solvents, solvent body wipes and use of other non-photo-chemically reactive solvents	Finish welding	16.53 MMBtu/hour natural gas, direct fired air space heater, ASH F

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	ASH G			

BAT Determination

Exclusive combustion of natural gas and low NO<sub>x</sub> burners.

11.03  
MMBtu/hour natural gas, direct-fired air space heater,  
ASH G

Exclusive combustion of natural gas and low NO<sub>x</sub> burners.

Exclusive combustion of natural gas and low NO<sub>x</sub> burners.

12.02  
MMBtu/hour natural gas, direct fired air space heater,

**DaimlerChrysler Corp**  
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	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.
	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.
Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.
	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.	

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<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>COATING EMISSIONS: Electrodeposition of low VOC prime coat, compliance with NSPS, 100 percent capture and a minimum 95 percent control efficiency thermal incineration of the drying oven exhaust. Compliance with the Ohio EPA Air Toxics Policy</p>
<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>Exclusive combustion of natural gas and emissions levels equivalent to FIRE emission factors.</p>	<p>Stage I and II submerged fill for the storage tanks. Compliance with the Ohio EPA Air Toxics Policy</p>	<p>OVEN COMBUSTION GASES: natural gas combustion, 5 percent opacity</p>

**DaimlerChrysler Corp**  
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	OVEN COMBUSTION GASES: natural gas combustion, 5 percent opacity.	a minimum 95 percent control efficiency thermal incineration of the clearcoat drying oven exhaust. Compliance with the Ohio EPA Air Toxics Policy		adequate enclosure and control, 5 percent opacity. Compliance with the Ohio EPA Air Toxics Policy.
COATING EMISSIONS: Electrostatic application of low VOC powder coat**, compliance with NSPS, particulate filtration for overspray with discharge within the building. Compliance with the Ohio EPA Air Toxics Policy.	COATING EMISSIONS: application of waterborne basecoat and solvent borne clearcoat, compliance with NSPS, 5 percent opacity, particulate filtration, 100 percent capture and	INFRARED FLASH TUNNEL and OVEN COMBUSTION GASES: natural gas combustion, 5 percent opacity  PROCESS EMISSIONS: compliance coatings, particulate filtration for overspray, 5 percent opacity	5 percent opacity, particulate filtration Use of low VOC coatings. Compliance with the Ohio EPA Air Toxics Policy	Low VOC materials, proper dispenser and disposal container design. Compliance with the Ohio EPA Air Toxics Policy  Non-photochemically reactive low VOC materials, proper dispenser and disposal container design. Compliance with the Ohio EPA Air Toxics Policy.
			Compliance coatings,	

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<p>Compliance with the Ohio EPA Air Toxics Policy.</p> <p>Non-photoc hemically reactive low VOC materials, proper dispenser and disposal container design. Compliance with the Ohio EPA Air Toxics Policy.</p>	<p>Compliance with the Ohio EPA Air Toxics Policy.</p> <p>Adequate enclosure and control, 20 percent opacity</p>	<p>Paving, sweeping and adequate moisture; no visible emissions except: paved - 1 minute per hour, , covered vehicles, clean up of spilled material.</p>	<p>Exclusive combustion of natural gas and emission levels equivalent to FIRE emission factors</p>	
<p>8 pounds of VOC per hour and 40 pounds of VOC per day, proper dispenser and disposal container design.</p>	<p>Adequate enclosure and control, 20 percent opacity</p>	<p>Exclusive combustion of natural gas and emission levels equivalent to FIRE emission factors</p>	<p>Exclusive combustion of natural gas and emission levels equivalent to FIRE emission factors</p>	

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			<u>Applicable Federal &amp; OAC Rules</u>	
		345-31-10 thru 20, and 40 CFR Part 52.21		345-31-10 thru 20, and 40 CFR Part 52.21
		40 CFR Part 63, Subparts A and DDDDD	345-31-10 thru 20, and 40 CFR Part 52.21	345-31-10 thru 20, and 40 CFR Part 52.21
	3745-17-07(A)		40 CFR Part 63, Subparts A and DDDDD	40 CFR Part 63, Subparts A and DDDDD
	3745-17-10 (B)(1)* 3745-18-06(A) and (D) 3745-21-08 (B) 3745-23-06 (B)	3745-17-07(A)	40 CFR Part 60, Subpart Dc	3745-18-06 (A) and (B) 3745-21-08(B) 3745-23-06(B) 3745-31-05
	3745-31-05		3745-17-07(A)*	
		3745-17-10 (B)(1)* 3745-18-06(A) and (D) 3745-21-08 (B) 3745-23-06 (B)	3745-17-10 (B)(1)* 3745-18-06(A) and (D) 3745-21-08 (B) 3745-23-06 (B)	
		3745-31-05	3745-31-05	3745-31-10 thru 20 and 40 CFR Part 52.21
				3745-18-06 (A) and (B) 3745-21-08(B)

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3745-23-06 (B)	3745-31-05	3745-31-10 thru 20 and 40 CFR Part 52.21		3745-18-06 (A) and (B)
3745-31-05		3745-18-06 (A) and (B)	3745-31-10 thru 20 and 40 CFR Part 52.21	3745-21-08(B)
	3745-31-10 thru 20 and 40 CFR Part 52.21	3745-21-08(B)		3745-23-06(B)
3745-31-10 thru 20 and 40 CFR Part 52.21	3745-18-06 (A) and (B)	3745-23-06(B)		3745-31-05
3745-18-06 (A) and (B)	3745-21-08 (B)	3745-31-05	3745-18-06 (A) and (B)	
3745-21-08 (B)	3745-23-06 (B)	3745-31-10 thru 20 and 40 CFR Part 52.21	3745-21-08(B)	3745-31-10 thru 20, and 40 CFR Part 52.21
3745-23-06 (B)	3745-31-05		3745-23-06(B)	
3745-31-05		3745-18-06 (A) and (B)	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-18-06 (A) and (B)
	3745-31-10 thru 20 and 40 CFR Part 52.21	3745-21-08(B)		3745-21-08(B)
		3745-23-06(B)		3745-23-06(B)
		3745-31-05		3745-31-05
	3745-18-06		3745-18-06 (A) and (B)	
3745-31-10 thru 20 and 40 CFR Part 52.21	3745-21-08(B)	3745-31-10 thru 20 and 40 CFR Part 52.21	3745-21-08(B)	3745-31-10 thru 20, and 40 CFR Part 52.21
	3745-23-06(B)		3745-23-06(B)	
	3745-31-05	3745-18-06 (A) and (B)	3745-31-10 thru 20, and 40 CFR Part 52.21	52.21
3745-18-06 (A) and (B)		3745-21-08(B)		3745-18-06 (A) and (B)
3745-21-08 (B)		3745-23-06(B)		3745-21-08(B)
3745-23-06 (B)		3745-31-05	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-23-06(B)
				3745-31-05

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		52.21		
		3745-21-09(R)		3745-31-10 thru 20, and 40 CFR Part 52.21
		3745-21-09(DDD)(4)(c)		
		3745-31-05		40 CFR Part 63, Subparts A, IIII, and DDDDD
3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-10 thru 20, and 40 CFR Part 52.21		3745-31-10 thru 20, and 40 CFR Part 52.21	COATING: 40 CFR Part 60 Subpart MM*
3745-18-06 (A) and (B)	3745-18-06	3745-31-10 thru 20 and 40 CFR Part 52.21	40 CFR Part 63, Subparts A, IIII, and DDDDD	
3745-21-08 (B)	3745-21-08(B)*			
3745-23-06 (B)	3745-23-06(B)			
3745-31-05	3745-31-05	COATING: 40 CFR Part 60 Subpart MM*	COATING: 40 CFR Part 60 Subpart MM*	3745-17-07(A)(1)* 3745-17-11(A)(2)* 3745-21-09 (B)(1) and (3)(j)* 3745-21-09(C)(1)(c)* 3745-31-05
		3745-21-09 (B)(1) and (3)(j)*	3745-21-09 (B)(1) and (3)(j)*	
		3745-21-09 (C)(1)(a)(ii)-(iv)*	3745-21-09(C)(1)(a)(v)*	
		3745-31-05	3745-31-05	
3745-31-10 thru 20, and 40 CFR Part 52.21		3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-10 thru 20, and 40 CFR Part 52.21
			OVEN:	40 CFR Part 63, Subparts A, IIII, and DDDDD
3745-18-06 (A) and (B)		3745-17-07 (A)(1)*	3745-17-07(A)(1)*	
3745-21-08 (B)		3745-17-10(B)(1)*	3745-17-10(B)(1)*	
3745-23-06 (B)		3745-18-06(A)	3745-18-06(A)	3745-17-07 (A)(1)*
3745-31-05	3745-31-10 thru 20 and 40 CFR Part	3745-21-08(B)	3745-21-08(B)*	3745-17-10 (B)(1)*
		3745-23-06(A) and (B)	3745-23-06(A) and (B)*	3745-18-06(A)
		3745-31-05	3745-31-05	3745-21-08(B)
				3745-23-06(B)

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3745-31-05			3745-31-05	
3745-31-10 thru 20 and 40 CFR Part 52.21		3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-17-08(B)(3)
3745-17-07 (A)(1)	3745-17-07(A)(1)*	40 CFR Part 63, Subparts A and III	40 CFR Part 63, Subparts A and III	3745-31-05
3745-17-11 (A)(2)	3745-17-11(A)(2)			3745-31-10 thru 20, and 40 CFR Part 52.21
3745-21-09 (B)(1) and (3)(f) and (g)	3745-21-09 (B)(1) and (3)(f) and (g)	3745-31-05	3745-21-07(G)(2)	40 CFR Part 52.21
3745-21-09 (C)(1)(d)*	3745-21-09(U)(1)(i)*			40 CFR Part 63, Subparts A and III
3745-31-05	3745-31-05	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-05	
3745-17-07 (A)(1)		40 CFR Part 63, Subparts A and III	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-05
3745-17-11 (A)(2)				
3745-21-09 (B)(1) and (3)(f) and (g)		3745-21-07(G)(9)(f)		
3745-21-09 (C)(1)(d)*		3745-31-05	40 CFR Part 63, Subpart A and III	3745-17-07 (B)(4)*
3745-31-05	3745-31-10 thru 20, and 40 CFR Part 52.21		3745-17-07(B)(1)	3745-17-08 (B), (B)(7), (B)(8), (B)(9)*
	40 CFR Part 63, Subparts A and III	3745-31-10 thru 20, and 40 CFR Part 52.21	3745-17-08(B)(3)	
3745-31-10 thru 20, and 40 CFR Part 52.21			3745-31-05	OAC rule 3745-18-06 (A) and (B)
3745-17-08(B)(3)		3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-10 thru 20, and 40 CFR Part 52.21	OAC rule 3745-21-08 (B)
3745-21-09* (B)(1) and (B) (3)		40 CFR Part 63, Subparts A and III		OAC rule 3745-23-06 (B)
40 CFR Part 63, Subpart A and III	(a), (f) & (g) or (h) & (i)		40 CFR Part 63, Subparts A and III	OAC rule 3745-31-05(A)(3)
	3745-21-09(C)(1)(d)	3745-21-07(G)(9)(f)		
	3745-31-05		3745-17-07(B)(1)	

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	(A)(3)	Permit Allowable Mass Emissions and/or Control/Usage Requirements		11.9 tons CO/year, 7.0 tons NO <sub>x</sub> /year, 0.81 tons PM <sub>10</sub> /year, 0.09 ton SO <sub>2</sub> /year, and 0.78 ton VOC/year.
3745-31-10 thru 20, and 40 CFR Part 52.21	3745-31-10 thru 20, and 40 CFR Part 52.21	See II.B.2.	See I.A.3.	See II.
OAC rule 3745-18-06 (A) and (B)	OAC rule 3745-18-06 (A) and (B)		See II.B.2.	
OAC rule 3745-21-08 (B)	OAC rule 3745-21-08 (B)			See I.A.3.
OAC rule 3745-23-06 (B)	OAC rule 3745-23-06 (B)	see II.A.1.		See II.B.2.
OAC rule 3745-31-05 (A)(3)	OAC rule 3745-31-05(A)(3)	See II.A.2.** Gas: 0.083 pound CO/MMBTU, 0.049 pound NO <sub>x</sub> /MMBTu,** 0.0056 pound PM <sub>10</sub> /MMBTU,** 0.0006 pound SO <sub>2</sub> /MMBTU, 0.0054 pound VOC/MMBTu** and 5 percent opacity.	see II.A.1.	see II.A.1.
OAC rule 3745-18-06 (A) and (B)	OAC rule 3745-21-08 (B)	11.9 tons CO/year, 7.0 tons NO <sub>x</sub> /year, 0.81 tons PM <sub>10</sub> /year, 0.09 ton SO <sub>2</sub> /year, and 0.78 ton VOC/year.	See II.A.2.** Gas: 0.083 pound CO/MMBTU, 0.049 pound NO <sub>x</sub> /MMBTu,** 0.0056 pound PM <sub>10</sub> /MMBTU,** 0.0006 pound SO <sub>2</sub> /MMBTU, 0.0054 pound VOC/MMBTu** and 5 percent opacity.	See II.A.2.** Gas: 0.083 pound CO/MMBTU, 0.049 pound NO <sub>x</sub> /MMBTu,** 0.0056 pound PM <sub>10</sub> /MMBTU,** 0.0006 pound SO <sub>2</sub> /MMBTU, 0.0054 pound VOC/MMBTu** and 5 percent opacity.
OAC rule 3745-23-06 (B)	OAC rule 3745-31-05	See II.		11.9 tons CO/year, 7.0 tons NO <sub>x</sub> /year,

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0.81 tons PM <sub>10</sub> /year, 0.09 ton SO <sub>2</sub> /year, and 0.78 ton VOC/year. See II.	See XVII.		0.0052 pound VOC/MMBTu actual heat input**.	1.2 tons CO/year 6.0 tons NO <sub>x</sub> /year 0.51 ton VOC/year See XVII.
See I.A.3.	See XVII.A.	0.02 pound CO/MMBTU actual heat input.	1.1 tons CO/year 5.3 tons NO <sub>x</sub> /year 0.28 ton VOC/year See XVII.	See XVII.
See XVII.A	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**. 0.0052 pound VOC/MMBTu actual heat input**.	0.1 pound NO <sub>x</sub> /MMBTU actual heat input**. 0.0052 pound VOC/MMBTu actual heat input**.	See XVII.A.	See XVII.A.
0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	See XVII.	1.1 tons CO/year 5.3 tons NO <sub>x</sub> /year 0.28 ton VOC/year See XVII.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.
0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.
0.02 pound CO/MMBTU actual heat input**.	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.	1.1 tons CO/year 5.3 tons NO <sub>x</sub> /year 0.28 ton VOC/year See XVII.
0.0052 pound VOC/MMBTu actual heat input**.	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	See XVII.A.
1.1 tons CO/year 5.3 tons NO <sub>x</sub> /year 0.28 ton VOC/year	See XVII.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.
0.28 ton VOC/year	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.
0.28 ton VOC/year	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.	0.93 tons CO/year 4.6 tons NO <sub>x</sub> /year 0.24 ton VOC/year See XVII.
0.28 ton VOC/year	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.0052 pound VOC/MMBTu actual heat input**.	See XVII.A.



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	See I.A.3.	VOC - 0.0054 pound/MMBtu** and 1.1 tons/year,	PM <sub>10</sub> /year, 5 percent opacity. See X.	
See V.A. 1.	8.63 pounds VOC per gallon of applied coating solids**, See VI.A.1. and 2. 768.68 tons	5 percent opacity, See VI.	See I.A.3.	0.5 pound VOC/gallon excluding water and exempt solvents as a monthly average**, 55.06 tons VOC/year, See XIV.
CO - 0.083 pound/MM Btu and 12.9 tons/year, NO <sub>x</sub> - 0.100 pound/MM Btu** and 15.5 tons/year, PM <sub>10</sub> - 0.0056 pound/MM Btu** and 0.87 ton/year, SO <sub>2</sub> - 0.0006 pound/MM BTU and 0.093 ton/year, VOC - 0.0054 pound/MM BTU** and 0.84 ton/year, 5 percent opacity, See V.	VOC/year, 15.3 pounds PM <sub>10</sub> /hour**, and 66.9 tons PM <sub>10</sub> /year, 5 percent opacity. See VI.	0.551 pound PM <sub>10</sub> /hour**, 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents**, 28 tons VOC/year, 2.4 tons PM <sub>10</sub> /year, 5 percent opacity	See XII.A.	See I.A.3.
		See VII.	4.8 pounds of VOC per gallon of coating excluding water and exempt solvents **	See XV.A.1.
	See I.A.3.	See I.A.3.	5.6 tons VOC/year, See XII.	See XV.A.3.** 52.28 tons VOC per rolling 12-month period**, See XV.
	See VI.A.3.		See I.A.3.	
	CO - 0.083 pound/MMBtu and 16.2 tons/year, NO <sub>x</sub> - 0.100 pound/MMBtu** and 19.5 tons/year, PM <sub>10</sub> - 0.0056 pound/MMBtu** and 1.1 tons/year, SO <sub>2</sub> - 0.0006 pound/MMBtu and 0.12 ton/year,	0.63 pound PM <sub>10</sub> /hour**	See XIII.A.2.**	See I.A.3.
		2.0 pounds of VOC per gallon of coating excluding water and exempt solvents**, 54 tons VOC/year, 2.8 tons	514.18 tons VOC per rolling 12-month period**, See XIII.	8 pounds of VOC per hour and 40 pounds of VOC per day**, 5.1 tons VOC/year. See XVI.
			See I.A.3.	See I.A.3.
			See XIV.A.1.	

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See XVIII.A.1.	See XX.B.1 . 0.32 pound PM <sub>10</sub> /hour.	heat input**. 0.0052 pound VOC/MMBtu actual heat input**. 1.45 tons CO/year 7.24 tons NO <sub>x</sub> /year 0.38 ton VOC/year	See XVII.	
See XVIII.A.2.	1.4 tons PM <sub>10</sub> /year.	See XVII.		
0.48 pound PM <sub>10</sub> /hour* *, 2.1 tons PM <sub>10</sub> /year.				
See I.A.3.	See XVII.A.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**. 0.0052 pound VOC/MMBtu actual heat input**.		
See XIX.A.1.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.	0.97 ton CO/year 4.84 tons NO <sub>x</sub> /year 0.26 ton VOC/year	See XVII.	
See XIX.A.2.	VOC/MMBtu actual heat input**. 1.06 tons CO/year			
0.56 pound PM <sub>10</sub> /hour* *, 2.4 tons PM <sub>10</sub> /year.	5.27 tons NO <sub>x</sub> /year 0.28 ton VOC/year See XVII	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual heat input**.		
See XIX.	0.02 pound CO/MMBTU actual heat input. 0.1 pound NO <sub>x</sub> /MMBTU actual	0.0052 pound VOC/MMBtu actual heat input**.		
See I.A.3.	1.06 tons CO/year 5.27 tons NO <sub>x</sub> /year 0.28 ton VOC/year	1.06 tons CO/year 5.27 tons NO <sub>x</sub> /year 0.28 ton VOC/year		

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- \* This applicable rule is less stringent than the rule that resulted in the emission limitation.
- \*\* This is a federally enforceable BACT limitation. The State BAT limitation is equivalent to this value.

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	1583.68
Particulate/PM <sub>10</sub>	83.04
NO <sub>x</sub>	189.32
CO	99.4
SO <sub>2</sub>	0.55

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
K021	EDP prime coat operation	MM
K022	Powder anti-chip (guidecoat) operation	MM
K023	Topcoat operation	MM
B008	Energy center boiler	Dc
B009	Energy center boiler	Dc
B010	Energy center boiler	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

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- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669  
Columbus, OH 43216-3669

and **Toledo Division of Environmental Services**  
**348 South Erie Street**  
**Toledo, OH 43602**

### **PSD REQUIREMENTS**

The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency 40 CFR 52.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the United States Environmental Protection Agency.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply: (1) the effective date of this permit shall be 30 days after the service of notice to any public commentors of the final decision to issue, modify, or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service of notice; and (2) if an appeal is made to the Administrator of the United States Environmental Protection Agency, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

### **RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

### **REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Division of**

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**Environmental Services, 348 South Erie Street, Toledo, OH 43602.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Toledo Division of Environmental Services, 348 South Erie Street, Toledo, OH 43602.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

### **NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

### **GASOLINE DISPENSING FACILITIES**

BAT for any gasoline dispensing operation identified within this permit consists of the use of Stage I vapor balance system. The vapor balance system shall be designed and operated to route at least 90% by weight of the organic compounds in the displaced vapors from the storage tanks to the delivery vessel and shall be equipped with a means to prevent the discharge into the atmosphere of displaced vapors from an unconnected vapor line. This shall be used at all times when filling the tanks.

The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

This facility shall be serviced by a bulk gasoline plant or terminal that is in compliance with OAC Rule 3745-21-09(P) or (Q), respectively.

There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.

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All fill caps shall be "in place" and clamped during normal storage conditions.

The gasoline dispensing facility shall repair within 15 days any leaks from the vapor balance system which is employed to meet the requirements of Paragraph (A)(3) of OAC Rule 3745-31-05 or Paragraph (R)(1) of OAC Rule 3745-21-09 when such leaks are equal to or greater than 100% of the lower explosive limit of propane, as determined under Paragraph (K) of OAC Rule 3745-21-10.

### **CONSTRUCTION COMPLIANCE CERTIFICATION**

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

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **I. Facility**

#### **A. Operational Restrictions**

1. These Additional Special Terms and Conditions do not release the owner or operator from meeting other applicable requirements of the appropriate MACT federal standards.
2. The emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub> and VOC from this facility shall not exceed 99.4, 189.32, 83.04, 0.55 and 1583.68 tons per year, respectively, as a rolling, 12-month total.

Compliance with the annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

3. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts A, IIII, and DDDDD.
4. Emissions units K025 (underbody deadener), K026(chassis spray), and K028(export coating) were never installed and have been deleted from this PTI.

#### **B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the:
  - a. usage of each VOC containing material such as paints, solvents, sealers and adhesives;
  - b. VOC content and solids content (as appropriate) of these materials;

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- c. natural gas usage;
- d. most recent complete and approved testing results of pollution control systems and related factors used in determining emissions; and,
- e. documentation for determination of emissions of monthly VOC emissions and conformance with VOC BAT limits to demonstrate compliance with these emissions limitations. The rolling 12-month summation of the monthly emissions will be used to demonstrate compliance with the annual emission limitations.

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**C. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub> and/or VOC and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall also submit annual reports which specify the facility wide emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub> and VOC for the previous calendar year. These reports shall be submitted by April 30 of each year.
3. The permittee shall submit quarterly reports summarizing the ongoing construction progress on the emissions units comprising this permit to install. These reports shall, at a minimum, identify those emissions units for which installation is not complete, and the scheduled completed installation date for each such unit.

These reports shall begin with the first full quarter in which a saleable vehicle is produced and shall be submitted by April thirtieth, July thirty-first, October thirty-first, and January thirty-first of each year, unless otherwise specified by the Toledo Division of Environmental Services, and shall cover the data obtained during the previous calendar quarters.

**D. Testing Requirements**

1. Compliance with the rolling, 12-month emission limitations for CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub> and/or VOC shall be demonstrated by calculations from the record\_keeping requirements of Additional Special Terms and Conditions I.B.

**E. Miscellaneous Requirements**

1. The permittee is approved to make the changes listed below to the extent allowed under Ohio Administrative Code Chapter 3745-31 (Note: It is highly recommended that the permittee discuss any future changes with the Toledo Division of Environmental Services **prior** to making those changes in order to avoid potential compliance problems):
  - a. components of the emissions units may be replaced in kind or replaced with a component with equivalent or inherently lower emissions if such a replacement would not qualify as a "reconstruction" under 40 CFR 60.15, and if, where applicable, the appropriate emission activity category form is revised to reflect the change;
  - b. operational changes which will not increase the short term emission limit established or exceed long term emission limitations;
  - c. any of the exemptions listed under OAC rule 3745-31-03;
  - d. introduction of new types of VOC containing materials used for new models which meet the

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- requirements of Additional Special Terms and Conditions I.E.2. and which will not increase the short term emission limit established or exceed long term emission limitations;
- e. changes in the number and type of applicator equipment if such components have equivalent or inherently lower emissions and will not increase the short term emission limit established or exceed long term emission limitations;
  - f. changes in the physical dimensions of each booth, dip tank or oven to accommodate production needs, provided that these changes do not reduce the overall collection efficiency, will not increase the short term emissions limits established or exceed the long term emissions limitations and, where applicable, the appropriate emission activity category form is revised to reflect the change;
  - g. addition or modification of auxiliary cleaning steps or coating operations where the process is covered by an existing permit and such changes will have equivalent or inherently lower emissions and will not increase the short term emission limit established or exceed long term emission limitations, and if, where applicable, the appropriate emission activity category form is revised to reflect the change;
  - h. changes in the number and type of emergency generators and fire pumps of 50 horsepower or less capacity and meeting the permanent exemption requirements in OAC 3745-31-03(A)(1)(nn);
  - i. changes in the number and type of space heaters and water heaters used to meet space or process heating needs of less than 10 million Btu capacity and meeting the permanent exemption requirements in OAC 3745-31-03(A)(1)(a);
  - j. new or replacement air pollution devices (such as scrubbers, baghouses and thermal oxidizers) where such changes will result in equivalent or inherently lower emissions and written notification of the change is forwarded to the Toledo Division of Environmental Services to schedule possible stack testing, and if, where applicable, the appropriate emission activity category form is revised to reflect the change;
  - k. changes to assembly operations (such as the use of sealers, wipes or adhesives and welding operations) where the operation is covered by an existing permit and such changes will not increase the short term emission limit established or exceed long term emission limitations, or where the operation meets the exemption requirements in OAC 3745-15-05(B) or OAC 3745-15-05(D), and if, where applicable, the appropriate emission activity category form is revised to reflect the change; and,
  - l. any other change for which the emissions impact of any involved emissions unit is below the significance level for all criteria pollutants and which is specifically exempted by regulation from State and Federal permitting requirements, including PSD and if, where applicable, the appropriate emission activity category form is revised to reflect the change.
2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 04-1102. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the Toluene 2,4 diisocyanate, Formaldehyde, Phosphoric acid, Triethanolamine, Nitric acid, Ethanolamine, Glycerine, Vinyl chloride, Benzene, Vinyl acetate, n-Butyl alcohol, Ethylene glycol monobutyl ether (2-butoxy ethanol), 1,2,4-Trimethylbenzene, Diisobutyl ketone, Isobutyl alcohol, Toluene, Methyl isobutyl ketone, Methyl amyl ketone, Cumene, Methanol, Propylene glycol methyl ether,

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Ethylbenzene, Xylene, 3-Methyl butyl acetate (i.e., isoamyl acetate), n-Amyl acetate, Methyl ethyl ketone, Tetrahydrofuran, Dipropylene glycol monomethyl ether, Methyl n-propyl ketone, Isobutyl acetate, Butyl Acetate, Natural gasoline, Isopropyl alcohol, Isopropyl acetate, Aromatic Controlled Naphtha, Mineral Spirits, VM&P Naphtha (Mineral Spirits), Petroleum naphtha, Petroleum distillates, Naphthol Spirits, Solvent naphtha light aliphatic, Aromatic solvent 150, Light aromatic solvent naphtha, Odorless mineral spirits, Mineral Spirits (Hydrocarbons), Petroleum Distillates, Ethyl acetate, Heptane, Acetone and Ethanol emission concentrations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the "ISCST3" model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant:

CAS#:	Chemical Name:	Modeling	Max imum	Screening	TLV
		Input File	Concentratio	[ug/m3]:	(mg/m3)
		Name	(ug/m3)	(1/42 of	
584849	Toluene 2,4 diisocyanate	emissions	<1.0 TPY	0.86	0.036
50000	Formaldehyde	TACF2_9	6.5	6.5	0.37*
7664382	Phosphoric acid	TACD__8	6.4	24	1
102716	Triethanolamine	TACE__8	0.9	119	5
7697372	Nitric acid	TACD__8	6.4	124	5.2
141435	Ethanolamine	TACA__8	163.4	179	7.5
56815	Glycerine	TACA__8	3.4	238	10
75014	Vinyl chloride	emissions	<1.0 TPY	310	13
71432	Benzene	TACC__8	16.7	762	32
108054	Vinyl acetate	TACB__8	459	833	35
71363	n-Butyl alcohol	TACVOC	1,691	2,667	152*
111762	Ethylene glycol monobutyl ether; (2-butoxy ethanol)	TACVOC 91	1,691	2,881	121
95636	1,2,4-Trimethylbenzene	TACVOC	1,691	2,929	123
108838	Diisobutyl ketone	TACVOC	1,691	3,452	145
78831	Isobutyl alcohol	TACVOC	1,691	3,619	152
108883	Toluene	TACVOC	1,691	4,476	188
108101	Methyl isobutyl ketone	TACVOC	1,691	4,881	205
110430	Methyl amyl ketone	TACVOC	1,691	5,548	233

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98828	Cumene	TACVOC	1,691	5,857	246
67561	Methanol	TACVOC	1,691	6,238	262
107982	Propylene glycol methyl ether	TACVOC	1,691	8,786	369
100414	Ethylbenzene	TACVOC	1,691	10,333	434
1330207	Xylene	TACVOC	1,691	10,333	434
123922	3-Methyl butyl acetate (i.e., isoamyl acetate)	TACVOC 91	1,691	12,667	532
628637	n-Amyl acetate	TACVOC	1,691	12,667	532
78933	Methyl ethyl ketone	TACVOC	1,691	14,048	590
109999	Tetrahydrofuran	TACVOC	1,691	14,048	590
34590948	Dipropylene glycol monomethyl ether	TACVOC 91	1,691	14,429	606
107879	Methyl n-propyl ketone	TACVOC	1,691	16,786	705
110190	Isobutyl acetate	TACVOC	1,691	16,976	713
123864	Butyl Acetate	TACVOC	1,691	16,976	713
8006619	Natural gasoline	TACVOC	1,691	21,190	890
67630	Isopropyl alcohol	TACVOC	1,691	23,405	983
108214	Isopropyl acetate	TACVOC	1,691	24,762	1040
64602	Aromatic Controlled Naphtha	TACVOC	1,691	32,619	1370
64704	Mineral Spirits (1)	TACVOC	1,691	32,619	1370
8032324	VM&P Naphtha (Mineral	TACVOC	1,691	32,619	1370
64741419	Petroleum naphtha (1)	TACVOC	1,691	32,619	1370
64741657	Mineral spirits (1)	TACVOC	1,691	32,619	1370
64741895	Petroleum distillates (1)	TACVOC	1,691	32,619	1370
64742489	Naphthol Spirits (1)	TACVOC	1,691	32,619	1370
64742887	Mineral spirits (1)	TACVOC	1,691	32,619	1370
64742898	Solvent naphtha, light	TACVOC	1,691	32,619	1370
64742945	Aromatic solvent 150 (1)	TACVOC	1,691	32,619	1370
64742956	Light aromatic solvent	TACVOC	1,691	32,619	1370
68551177	Odorless mineral spirits (1)	TACVOC	1,691	32,619	1370
68647609	Mineral Spirits	TACVOC	1,691	32,619	1370
64742536A	Petroleum Distillates (1)	TACVOC	1,691	32,619	1370
141786	Ethyl acetate	TACVOC	1,691	34,286	1440
142825	Heptane	TACVOC	1,691	39,048	1640
67641	Acetone	TACVOC	1,691	42,381	1780
64175	Ethanol	TACVOC	1,691	44,762	1880

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\* 8 hour STEL which may be converted to a one-hour concentration using a factor of 0.737,

Note: "worse case scenario" assumes that any given toxic comprises the entire stream.

3. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Toledo Division of Environmental Services is required, including the possible issuance of modifications to PTI number 04-1102 and the operating permit:
  - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
  - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table; and,
  - c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

## II. Energy Center Boiler (B008, B009 & B010)

### A. Operational Restrictions

1. This emissions unit shall be exempt from the stated sulfur dioxide limitations during any calendar day in which 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 is the only fuel burned.
2. The permittee shall burn only natural gas in these emissions units.

### B. Monitoring and/or Record Keeping Requirements

1. The permittee shall comply with the applicable monitoring and record\_keeping requirements in 40 CFR Part 60 Subpart Dc.
2. The permittee shall maintain monthly records of the total quantity of natural gas burned in this emissions unit.
3. For each day during which the permittee burns a fuel other than natural gas , the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.

### C. Reporting Requirements

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

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**D. Testing Requirements**

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

a. Emission Limitation

5 percent opacity for gas , as a 6 minute average except as provided by rule.

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Applicable Compliance Method

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation

0.083 pound of carbon monoxide emissions per MMBtu actual heat input

Applicable Compliance Method

Compliance with the pound/MMBtu limitation may be based upon an emission factor of 0.083 lb CO/MMBtu ((84 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 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

0.049 pound of nitrogen oxides emissions per MMBtu actual heat input for gas

Applicable Compliance Method

Compliance with the pound/MMBtu limitation may be based upon an emission factor of 0.049 lb NO<sub>x</sub>/MMBtu ((50 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 7 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

0.0056 pound of particulate matter (as PM<sub>10</sub>) per million Btu of actual heat input for gas

Applicable Compliance Method

Compliance with the pound/MMBtu limitation may be based upon an emission factor of 0.0056 lb PM<sub>10</sub>/MMBtu ((5.7 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 201 and 202 of 40 CFR Part 51, Appendix

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

e. Emission Limitation

0.0006 pound of sulfur dioxide emissions per million Btu actual heat input

Applicable Compliance Method

Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0006 lb SO<sub>2</sub>/MMBtu ((0.6 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98, or OAC rule 3745-18-04(G)(3). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 6 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

0.0054 pound of volatile organic compound per million Btu of actual heat input for gas

Applicable Compliance Method

Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0054 lb VOC/MMBtu ((5.5 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 or 25A 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

11.9 tons CO, 7.0 tons NO<sub>x</sub>, 0.81 ton PM, 0.09 ton SO<sub>2</sub>, and 0.78 ton VOC per calendar year.

Applicable Compliance Method

Compliance with this emission limitation shall be determined by multiplying the pound/MMBtu emission limitation for each pollutant by the maximum annual firing rate (32.66 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

h. Emission Limitation

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.

Applicable Compliance Method

The exclusive use of commercially available natural gas will be considered adequate demonstration

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of compliance.

**E. Miscellaneous Requirements**

1. If in the future the permittee applies for a permit modification to burn fuels other than the natural gas allowed by this permit, the BAT determination for this emissions unit will be re-evaluated on a case by case basis.

**III. Gasoline Fill Stations, G003**

**A. Operational Restrictions**

1. The permittee shall not cause, allow or permit the transfer of gasoline at a gasoline dispensing facility used to fuel newly constructed vehicles unless the following requirements are met:
  - a. any stationary storage tank which stores gasoline at the gasoline dispensing facility is equipped with a submerged fill pipe;
  - b. for any transfer of gasoline from a delivery vessel to a stationary storage tank located at the gasoline dispensing facility, the vapors displaced from the stationary storage tank are processed by one of the following systems:
    - i. a vapor balance system which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the delivery vessel and which is equipped with a means to prevent the discharge of displaced vapors from an unconnected vapor line;
    - ii. a vapor control system which is designed and operated to recover at least 90 percent by weight of the VOC in the displaced vapors.
2. The permittee shall comply with the following operational restrictions for the Stage I vapor control system:
  - a. the vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline;
  - b. there shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers;
  - c. there shall be no leaks in the vapor liquid lines during the transfer of gasoline; and,
  - d. all fill caps shall be "in place" and clamped during normal storage conditions.
3. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under

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paragraph (K) of OAC rule 3745-21-10.

4. The permittee shall not cause, allow, or permit the transfer of gasoline from a stationary storage tank into a motor vehicle unless all vapors displaced from the motor vehicle are vented to a vapor control system which is designed and operated to maintain an overall control efficiency of not less than 90 percent, by weight, for the VOC in the displaced vapors. The vapor control system shall employ only coaxial hoses, and the use of remote check valves shall be prohibited.
5. All the vehicles filled by this gasoline dispensing facility shall be equipped with an ORVR system that achieves a 95% overall control efficiency for VOCs and meets the requirements of 40 CFR 86.099-8. Because an ORVR control system is employed, the other requirements of OAC rule 3745-21-09(DDD) relating to Stage II control systems are not relevant.

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**B. Monitoring and/or Record Keeping Requirements**

1. When the Stage I vapor control system is being used for control, The permittee shall maintain records of the following information:
  - a. the results of any leak checks, including, at a minimum, the following information:
    - i. date of inspection;
    - ii. findings (may indicate no leaks discovered or location, nature, and severity of each leak);
    - iii. leak determination method;
    - iv. corrective action, when such actions are necessary (date each leak repaired and reasons for any repair interval in excess of 15 calendar days); and,
    - v. inspector's name and signature.
  - b. the quantity of gasoline delivered to the facility during each calendar month;
  - c. the results of any tests performed pursuant to the testing requirements specified in this permit;
  - d. a log of the date and description of all repair and maintenance work performed (including, but not limited to, work performed to meet manufacturer's specifications), or any other modifications made to the vapor control system;
  - e. proof of attendance and completion of the training required by the Ohio EPA for the operator or local supervisor of the gasoline dispensing facility; and,
  - f. copies of all completed post test inspection forms.

**C. Reporting Requirements**

1. When the Stage I vapor recovery system is being used for control, any leak from the vapor balance system or vapor control system that is not repaired within 15 days after identification shall be reported to the Director within 30 days after the repair is completed.
2. A comprehensive written report on the results of any tests performed in accordance with the requirements of this permit shall be submitted within 30 days following the completion of the tests.

**D. Testing Requirements**

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

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with the following methods(s):

a. Emission Limitation

34 tons of VOC emissions per year.

Applicable Compliance Method

Multiply the 1/95 AP-42 emission factor of 3.1 pounds VOC per 1000 gallons of gasoline by the annual summation of gasoline throughput.

b. Emission Limitation

Detection of leaks.

Applicable Compliance Method

OAC 3745-21-10(K) and OAC 3745-21-10(Q). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

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

Emission Limitation:

95% overall control efficiency for VOCs

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon USEPA's measurements of the ORVR system for each vehicle model produced at this facility and as documented in the USEPA's certificate of conformity. The permittee shall maintain records of all such certificates of conformity for the vehicles produced at this facility.

**E. Miscellaneous Requirements**

1. None.

**IV. E-COAT (K021)**

**A. Operational Restrictions**

1. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the drying oven. The thermal incinerator shall be installed, operated and maintained in accordance with the manufacturer's recommendations.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the incinerator is in operation as a VOC control device for compliance purposes, shall not be below the average

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temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

3. This emissions unit shall be exempt from the stated sulfur dioxide limitations during any calendar day in which 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 is the only fuel burned.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall comply with the applicable monitoring and record\_keeping requirements in 40 CFR Part 60.394 and 60.395.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the incinerator 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 modifications deemed necessary by the permittee and approved by the Toledo Division of Environmental Services.
3. The permittee shall collect and record the following information for each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in mass of VOC per volume of applied coating solids) or the daily 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 daily volume-weighted VOC content recorded in accordance with paragraph "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 calculated, controlled VOC emissions, in tons of VOC/month and tons of VOC per rolling, 12-month period. The controlled VOC emissions shall be calculated using the controlled VOC emissions rate in Section IV.B.3.d. above and the volume solids content per month from Section IV.B.3.b. above and a factor of 2000 lbs/ton.
  - f. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and,

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

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

**C. Reporting Requirements**

1. The permittee shall comply with the applicable reporting and record\_keeping requirements in 40 CFR Part 60.395.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing that the calculated, controlled VOC emission rate exceeds the applicable mass of VOC per volume of applied coating solids limitation. The notification shall include a copy of such record.
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 the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):
  - a. Emission Limitation  
 0.23 pound of VOC per gallon of applied coating solids.  
  
 Applicable Compliance Method  
  
 The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume weighted average mass of VOC emitted per volume of applied solids.
  - b. Emission Limitation  
 5 percent opacity from the incinerator.  
  
 Applicable Compliance Method  
  
 OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.
  - c. Emission Limitation  
 52.01 tons VOC/yr.

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## Applicable Compliance Method

Compliance with the emissions limitation will be demonstrated by the record keeping requirements of Additional Special Terms and Conditions IV.B.3., and by monthly records of coating usage and VOC content.

## d. Emission Limitation

CO: 0.083 pound/MMBtu & 9.5 tons/year, NO<sub>x</sub>: 0.100 lb/MMBtu & 11.4 tons/year, PM<sub>10</sub>: 0.0056 pound/MMBtu and 0.064 ton/year, SO<sub>2</sub>: 0.0006 pound/MMBtu and 0.068 ton/year, VOC: 0.0054 pound/MMBtu and 0.62 ton/year and 5 percent opacity from the oven combustion gases.

## Applicable Compliance Method

CO: Compliance with the pound/MMBtu limitation may be based upon an emission factor of 0.083 lb CO/MMBtu ((84 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.083 lb/MMBtu by the maximum annual firing rate for this emissions unit (26.0 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

NO<sub>x</sub>: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.099 lb NO<sub>x</sub>/MMBtu ((100 lb/mmscf)/1020 Btu/scf)) in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.099 lb/MMBtu by the maximum annual firing rate for this emissions unit (26.0 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

PM<sub>10</sub>: Compliance with the lb/MMBtu emission limitation may be based upon an emission factor of 0.0056 lb PM<sub>10</sub>/MMBtu ((5.7 lb PM/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. AP-42 states that all particulate from this process is presumed to be less than 1.0 micron in diameter. 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

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methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0056 lb/MMBtu by the maximum annual firing rate for this emissions unit (26.0 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

SO<sub>2</sub>: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0006 lb SO<sub>2</sub>/MMBtu ((0.6 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98, or OAC rule 3745-18-04(G)(3). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 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. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0006 lb/MMBtu by the maximum annual firing rate for this emissions unit (26.0 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

VOC: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0054 lb VOC/MMBtu ((5.5 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0054 lb/MMBtu by the maximum annual firing rate for this emissions unit (26.0 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

e. Emission Limitation

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.

Applicable Compliance Method

The exclusive use of commercially available natural gas will be considered adequate demonstration of compliance.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 30 days after achieving the maximum production rate at which the facility will be operated but not later than 180 days after the initial startup of the facility;
  - b. the emission testing shall be conducted to demonstrate compliance with the emission limitations for VOC;

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- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25 of 40 CFR Part 60, Appendix A in accordance with the procedures specified in 40 CFR Part 60.393. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;
- d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity;
- e. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393; and,
- f. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

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

**E. Miscellaneous Requirements**

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

**V. Powder Anti-chip (K022)**

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**A. Operational Restrictions**

1. This emissions unit shall be exempt from the stated sulfur dioxide limitations during any calendar day in which 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 is the only fuel burned.
2. The emissions of VOC from this emissions unit shall not exceed 3.25 tons per year, as a rolling, 12-month total.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions (Tons)VOC</u>
1	0.27
1-2	0.54
1-3	0.81
1-4	1.08
1-5	1.35
1-6	1.62
1-7	1.89
1-8	2.16
1-9	2.43
1-10	2.70
1-11	2.97
1-12	3.25

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall comply with the applicable monitoring and record\_keeping requirements in 40 CFR Part 60.394 and 60.395.
2. The permittee shall collect and record the following information for each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in mass of VOC per volume of applied coating solids, as applied) or the daily volume-weighted average VOC content (in mass of VOC per volume of applied coating solids) of all the coatings;

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- d. the calculated, VOC emission rate, in mass of VOC per volume of applied coating solids. The VOC emission rate shall be calculated using the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above.
- e. the monthly emissions of VOC and the rolling, 12-month summation of the monthly emissions;
- f. a log or record of operating time for the capture (collection) system, control device(s), monitoring equipment, and the associated emissions unit.

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

**C. Reporting Requirements**

- 1. The permittee shall comply with the applicable reporting and record keeping requirements in 40 CFR Part 60.395.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all daily records showing that the calculated, controlled VOC emission rate exceeds the applicable tons of VOC per rolling, 12-month period limitation. The notification shall include a copy of such record.

**D. Testing Requirements**

- 1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):
  - a. Emission Limitation
 

1.40 kilogram of VOC/liter (11.7 pounds VOC/gal) of applied coating solids.

Applicable Compliance Method

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

3.25 tons VOC per rolling 12-month period.

Applicable Compliance Method

The permittee shall calculate the rolling 12-month summation of emissions based on the record keeping requirements of Additional Special Term and Condition V.B.2. Where applicable, the

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permittee shall use OAC 3745-21-10(B) and the procedures in 40 CFR Part 60.393 for determining the monthly volume weighted average mass of VOC emitted per volume of applied solids.

## c. Emission Limitation

5 percent opacity from the oven.

## Applicable Compliance Method

OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

## d. Emission Limitation

CO: 0.083 pound/MMBtu and 12.9 tons/year, NO<sub>x</sub>: 0.100 pound/MMBtu and 15.5 tons/year, PM<sub>10</sub>: 0.0056 pound/MMBtu and 0.87 ton/year, SO<sub>2</sub>: 0.0006 pound/MMBtu and 0.093 ton/year, VOC: 0.0054 pound/MMBtu and 0.84 ton/year and 5 percent opacity from the oven combustion gases.

## Applicable Compliance Method

CO: Compliance with the pound/MMBtu limitation may be based upon an emission factor of 0.083 lb CO/MMBtu ((84 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.083 lb/MMBtu by the maximum annual firing rate for this emissions unit (35.8 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

NO<sub>x</sub>: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.099 lb NO<sub>x</sub>/MMBtu ((100 lb/mmscf)/1020 Btu/scf) in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.099 lb/MMBtu by the maximum annual firing rate for this emissions unit (35.8 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

PM<sub>10</sub>: Compliance with the lb/MMBtu emission limitation may be based upon an emission factor of 0.0056 lb PM<sub>10</sub>/MMBtu ((5.7 lb PM/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. AP-42 states that all particulate from this process is presumed to be less than 1.0 micron in diameter. If required, the permittee shall demonstrate compliance with this emission limitation in

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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. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0056 lb/MMBtu by the maximum annual firing rate for this emissions unit (35.8 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

SO<sub>2</sub>: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0006 lb SO<sub>2</sub>/MMBtu ((0.6 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98, or OAC rule 3745-18-04(G)(3). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 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. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0006 lb/MMBtu by the maximum annual firing rate for this emissions unit (35.8 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

VOC: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0054 lb VOC/MMBtu ((5.5 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0054 lb/MMBtu by the maximum annual firing rate for this emissions unit (35.8 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

e. Emission Limitation

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.

Applicable Compliance Method

The exclusive use of commercially available natural gas will be considered adequate demonstration of compliance.

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**E. Miscellaneous Requirements**

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

**VI. Topcoat (K023)**

**A. Operational Restrictions**

1. The permittee shall operate and maintain a thermal incinerator, with a 100 percent capture efficiency and a minimum of 95 percent control efficiency, to control VOC emissions from the clearcoat drying oven. The thermal incinerator shall be installed, operated and maintained in accordance with the manufacturer's recommendations.
2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the incinerator is in operation as a VOC control device for emissions fee or compliance purposes, shall not be below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. This emissions unit shall be exempt from the stated sulfur dioxide limitations during any calendar day in which 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 is the only fuel burned.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall comply with the applicable monitoring and record\_keeping requirements in 40 CFR Part 60.394.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the incinerator is in operation. Units shall be in degrees Fahrenheit and/or Centigrade. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee and approved by the Toledo Division of Environmental Services.
3. The permittee shall collect and record for each day a log or record of operating time for the capture (collection) system, control device(s), monitoring equipment, and the associated emissions unit.
4. The permittee shall collect and record the following information for each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the mass of VOC per volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

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- c. the maximum VOC content (in mass of VOC per volume of applied coating solids) or the daily 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 daily volume-weighted VOC content recorded in accordance with paragraph (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; and,
- e. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

**C. Reporting Requirements**

1. The permittee shall comply with the applicable reporting and record\_keeping requirements in 40 CFR Part 60.395.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all daily records which show that the calculated, controlled VOC emission rate exceeds the applicable mass of VOC per volume of solids limitation. The notification shall include a copy of such record.
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 the thermal incinerator, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

**D. Testing Requirements**

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

- a. Emission Limitation

8.63 pounds VOC per gallon of applied coating solids.

Applicable Compliance Method

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume weighted average mass of VOC emitted per volume of applied solids. Where applicable, compliance shall also be demonstrated pursuant to the methods and procedures set forth in the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty

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Truck Topcoat Operations", EPA-450-3-88-018, dated December 1988, and any subsequent revision approved by the EPA and the State of Ohio Environmental Protection Agency. For compliance purposes, a VOC content of 12.26 pounds per gallon will be considered to be equivalent to 1.47 kilograms per liter.

b. Emission Limitation

15.3 pounds of PM<sub>10</sub> per hour and 66.9 tons of PM<sub>10</sub> per year.

Applicable Compliance Method

The use of adequate control equipment, as demonstrated by the log or record of congruent operating times for the emissions unit, capture (collection) system and control device(s) required by special terms and conditions IV.B.3., shall be considered adequate demonstration of compliance.

c. Emission Limitation

5 percent opacity from the incinerator.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation

768.68 tons VOC/year.

Applicable Compliance Method

Compliance with the emissions limitation will be demonstrated by calculation from the record keeping requirements of special terms and conditions VI.B.4.

e. Emission Limitation

CO: 0.083 pound/MMBtu and 16.2 tons/year, NO<sub>x</sub>: 0.100 pound/MMBtu and 19.5 tons/year, PM<sub>10</sub>: 0.0056 pound/MMBtu and 1.1 tons/year, SO<sub>2</sub>: 0.0006 pound/MMBtu and 0.12 ton/year, VOC: 0.0054 pound/MMBtu and 1.1 tons/year and 5 percent opacity from the oven combustion gases.

Applicable Compliance Method

CO: Compliance with the pound/MMBtu limitation may be based upon an emission factor of

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0.083 lb CO/MMBtu ((84 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of

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Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.083 lb/MMBtu by the maximum annual firing rate for this emissions unit (44.4 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

NO<sub>x</sub>: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.099 lb NO<sub>x</sub>/MMBtu ((100 lb/mmscf)/1020 Btu/scf) in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.099 lb/MMBtu by the maximum annual firing rate for this emissions unit (44.4 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

PM<sub>10</sub>: Compliance with the lb/MMBtu emission limitation may be based upon an emission factor of 0.0056 lb PM<sub>10</sub>/MMBtu ((5.7 lb PM/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. AP-42 states that all particulate from this process is presumed to be less than 1.0 micron in diameter. 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. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0056 lb/MMBtu by the maximum annual firing rate for this emissions unit (44.4 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

SO<sub>2</sub>: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0006 lb SO<sub>2</sub>/MMBtu ((0.6 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98, or OAC rule 3745-18-04(G)(3). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 4 and 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. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0006 lb/MMBtu by the maximum annual firing rate for this emissions unit (44.4 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

VOC: Compliance with the pound/MMBtu emission limitation may be based upon an emission factor of 0.0054 lb VOC/MMBtu ((5.5 lb/mmscf)/(1020 Btu/scf)) specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2, dated 7/98. If required, the permittee shall demonstrate compliance with this emission limitation in

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accordance with the methods and procedures specified in Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A, using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. Compliance with the ton/year emission limitation shall be determined by multiplying the lb/MMBtu emission limitation of 0.0054 lb/MMBtu by the maximum annual firing rate for this emissions unit (44.4 MMBtu/hr x 8,760 hrs/yr), in MMBtu/yr, and dividing by 2000 lbs/ton.

f. Emission Limitation

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.

Applicable Compliance Method

The exclusive use of commercially available natural gas will be considered adequate demonstration of compliance.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 30 days after achieving the maximum production rate at which the facility will be operated but not later than 180 days after the initial startup of the facility;
  - b. the emission testing shall be conducted to demonstrate compliance with the emission limitations for VOC for the booth/oven and particulate from the booth;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 25 of 40 CFR Part 60, Appendix A in accordance with the procedures specified in 40 CFR Part 60.393 for the VOC emissions and OAC rule 3745-17-03(B)(10) for the particulate emissions. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services;
  - d. the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services;
  - e. the capture efficiency (i.e., the percent of total VOC which enters the control device) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393; and,
  - f. the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of

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the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.393. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases

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).

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

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

**E. Miscellaneous Requirements**

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

**VII. Low Bake Repair (K024)**

**A. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**B. Monitoring and/or Record Keeping Requirements**

1. When using complying coatings (i.e., each coating contains a maximum of 4.8 pounds VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record the following information each month for this emissions unit;
  - i. the name and identification number of each coating, as applied,
  - ii. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - iii. the 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.
2. When calculating a daily volume-weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit;
  - i. the name and identification number of each coating, as applied,
  - ii. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water

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and exempt solvents) of each coating, as applied, and

- iii. the 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.

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The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping. Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

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

3. The permittee shall maintain daily records that document any periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall collect and record the following information each month for the purpose of determining the average daily, monthly and annual VOC emissions:
  - 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;
  - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
  - d. the total number of gallons (excluding water and exempt solvents) of all coatings employed, calculated as a summation of the quantities recorded in (c) above;
  - e. the total VOC emissions from all coatings employed, in tons per month;
  - f. the rolling 12-month summation of emissions from all coatings employed, in tons per year;
  - g. the number of days the emissions units was in operation; and
  - h. the daily average VOC emissions rate, (e)/(g), in pounds per day.

**C. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.

**D. Testing Requirements**

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

- a. Emission Limitation

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

Applicable Compliance Method

OAC rule(s) 3745-21-09(C)(2) and 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. 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 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. Alternative formulation data may be used upon written approval of the Toledo Division of Environmental Services.

- b. Emission Limitation

0.551 pound of PM<sub>10</sub> per hour and 2.4 tons of PM<sub>10</sub> per year.

Applicable Compliance Method

The Monitoring and Record keeping requirements of Section VII.B.3., shall be considered adequate demonstration of compliance.

- c. Emission Limitation

5 percent opacity from the spoven.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- d. Emission Limitation

28 tons VOC/year.

Applicable Compliance Method

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Use of monthly records of each coating used and the VOC content of each coating used.

**E. Miscellaneous Requirements**

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

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X. Blackout (K027)

**A. Operational Restrictions**

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**B. Monitoring and/or Record Keeping Requirements**

1. When using a compliance coating (i.e., the coating contains a maximum of 2.0 pounds VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record the following information for this emissions unit;
  - i. the name and identification number of the coating, as applied,
  - ii. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of the coating, as applied, and
  - iii. the volume-weighted average VOC content of the coating, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
2. When calculating a daily volume-weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit;
  - i. the name and identification number of each coating, as applied,
  - ii. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - iii. the 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.

The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping. Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

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

3. The permittee shall maintain daily records that document any periods when the control system was not in service when the emissions unit was in operation.
4. The permittee shall collect and record the following information each month for the purpose of determining the average daily, monthly and annual VOC emissions:

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- 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;
- c. the number of gallons (excluding water and exempt solvents) of each coating employed;
- d. the total number of gallons (excluding water and exempt solvents) of all coatings employed, calculated as a summation of the quantities recorded in (c) above;
- e. the total VOC emissions from all coatings employed, in tons per month;
- f. the rolling 12-month summation of emissions from all coatings employed, in tons per year;
- g. the number of days the emissions units was in operation; and
- h. the daily average VOC emissions rate, (e)/(g), in pounds per day.

**C. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation  
2.0 pounds VOC per gallon of coating excluding water and exempt solvents.  
  
Applicable Compliance Method  
  
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If, pursuant to section 4.3 of Method 24, 40 CFR

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Part 60, Appendix A, an owner or operator 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. Alternative formulation data may be used upon written approval of the Toledo Division of Environmental Services.

b. Emission Limitation

54 tons VOC/year.

Applicable Compliance Method

Use of monthly records of each coating used and the VOC content of each coating used.

c. Emission Limitation

0.63 pound of PM<sub>10</sub> per hour and 2.8 tons of PM<sub>10</sub> per year.

Applicable Compliance Method

The Monitoring and Record keeping requirements of Section X.B.,3 shall be considered adequate demonstration of compliance.

d. Emission Limitation

5 percent opacity.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

**E. Miscellaneous Requirements**

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

**XII. Interior Touch-up (K029)**

**A. Operational Restrictions**

1. The permittee shall install and use hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent and control the fugitive dust.
2. The permittee shall operate the control system whenever this emissions unit is in operation.

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**B. Monitoring and/or Record Keeping Requirements**

1. When using complying coatings (i.e., each coating contains a maximum of 4.8 pounds VOC per gallon, excluding water and exempt solvents), the permittee shall collect and record the following information each month for this emissions unit;
  - i. the name and identification number of each coating, as applied,
  - ii. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - iii. the 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.
2. When calculating a daily volume-weighted average VOC content, the permittee shall collect and record the following information each day for this emissions unit;
  - i. the name and identification number of each coating, as applied,
  - ii. VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied, and
  - iii. the 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.

The permittee shall notify the Toledo Division of Environmental Services, in advance, when daily averaging will be used instead of monthly record keeping. Alternate, equivalent record keeping methods may be used upon written approval by the Toledo Division of Environmental Services.

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

3. The permittee shall maintain daily records that document any periods when the control system was not in service when the emissions unit was in operation.
4. The permittee shall collect and record the following information each month for the purpose of determining the average daily, monthly and annual VOC emissions:
  - 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;
  - c. the number of gallons (excluding water and exempt solvents) of each coating employed;

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- d. the total number of gallons (excluding water and exempt solvents) of all coatings employed, calculated as a summation of the quantities recorded in (c) above;
- e. the total VOC emissions from all coatings employed, in tons per month;
- f. the rolling 12-month summation of emissions from all coatings employed, in tons per year;
- g. the number of days the emissions units was in operation; and
- h. the daily average VOC emissions rate, (e)/(g), in pounds per day.

**C. Reporting Requirements**

1. The permittee shall notify the Toledo Division of Environmental Services in writing of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record that the control system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):
  - a. Emission Limitation  
  
4.8 pounds of VOC per gallon of coating excluding water and exempt solvents.  
Applicable Compliance Method  
  
Compliance will be demonstrated through the record keeping requirements of XII.B.
  - b. Emission Limitation  
  
5.6 tons VOC/year.  
  
Applicable Compliance Method  
  
Compliance shall be determined by utilizing the daily records contained in Section XII.B.

**E. Miscellaneous Requirements**

1. None.

**XIII. P007, Non-Production Maintenance Materials**

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**A. Operational Restrictions**

1. The permittee shall employ only appropriate solvent dispensers, disposal containers and booth cleaning techniques appropriate to minimize evaporation in this emissions unit.
2. The emissions of VOC from this emissions unit shall not exceed 514.18 tons per year, as a rolling, 12-month total.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions (Tons) VOC</u>
1	42
1-2	85
1-3	128
1-4	171
1-5	214
1-6	257
1-7	299
1-8	342
1-9	385
1-10	420
1-11	471
1-12	514.18

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the non-production maintenance material operations:
  - a. the company identification for each non-production maintenance material employed;
  - b. the number of gallons of each non-production maintenance material employed;
  - c. the organic compound content of each non-production maintenance material, in pounds per gallon excluding water and exempt solvents; and,

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- d. the monthly emissions of VOC and the rolling, 12-month summation of the monthly emissions.

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

**C. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports identifying any photochemically reactive non-production maintenance material that was used.
2. The permittee shall submit quarterly deviation (excursion) reports that identify records showing that the material used in this emissions unit exceeds the applicable limitation. The notification shall include a copy of such record.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following methods(s):
  - a. Emission Limitation

514.18 tons VOC per year, as a rolling, 12-month total.

Applicable Compliance Method

Compliance shall be demonstrated through the record\_keeping requirements of Additional Special Terms and Conditions XIII.B., and OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. 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 no 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.

**E. Miscellaneous Requirements**

1. None.

XIV. P008, Sealers and Adhesives

**A. Operational Restrictions**

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1. The permittee shall employ only non-photochemically reactive materials in this emissions unit.
2. The permittee shall employ only dispensers and disposal containers appropriate to minimize exposure times in this emissions unit.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the sealer and adhesive operations:
  - a. the company identification for each sealer and adhesive material employed;
  - b. a determination of whether each sealer and adhesive material is photochemically reactive or non-photochemically reactive as defined in OAC rule 3745-21-09(C)(5).
  - c. the unit quantity of each sealer and adhesive material employed;
  - d. the organic compound content of each sealer and adhesive material, in pounds per gallon excluding water and exempt solvents;
  - e. the monthly average organic compound content for all sealer and adhesive material, in pounds VOC per gallon excluding water and exempt solvents; and,
  - f. the monthly emissions of VOC and the rolling, 12-month summation of the monthly emissions.

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

**C. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports identifying any photochemically reactive sealer or adhesive material that was used.
2. The permittee shall submit quarterly deviation (excursion) reports that identify records showing that the material used in this emissions unit exceeds the applicable limitation. The notification shall include a copy of such record.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation  
  
0.5 pound VOC per gallon of sealer and adhesive material excluding water and exempt solvents as a monthly average.

Applicable Compliance Method

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OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. 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 so 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. Alternative, formulation data may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation

55.06 tons VOC/year.

Applicable Compliance Method

Use of monthly records of each sealer and adhesive used and the VOC content of each sealer and adhesive used.

c. Emission Limitation

Employ only non-photochemically reactive materials.

Applicable Compliance Method

Exclusion of materials meeting the definition in OAC 3745-21-01(C)(5).

**E. Miscellaneous Requirements**

1. None.

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XV. P009, Miscellaneous Solvents, solvent body wipes and plantwide use of other non-photochemically reactive solvents

**A. Operational Restrictions**

1. The permittee shall employ only non-photochemically reactive materials in this emissions unit.
2. The permittee shall employ only dispensers and disposal containers appropriate to minimize exposure times.
3. The emissions of VOC from this emissions unit shall not exceed 52.28 tons per year, as a rolling, 12-month total.

Compliance with the annual emission limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the solvent body wipes operations:
  - a. the company identification for each solvent employed;
  - b. a determination of whether each solvent is photochemically reactive or non-photochemically reactive as defined in OAC rule 3745-21-09(C)(5).
  - c. the number of gallons of each solvent employed;
  - d. the organic compound content of each solvent, in pounds per gallon excluding water and exempt solvents; and,
  - e. the monthly emissions of VOC and the rolling, 12-month summation of the monthly emissions.

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

**C. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports identifying any photochemically reactive sealer or adhesive material that was used.
2. The permittee shall submit quarterly deviation (excursion) reports that identify records showing that the material used in this emissions unit exceeds the applicable limitation. The notification shall include a copy of such record.

**D. Testing Requirements**

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

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a. Emission Limitation

52.28 tons VOC per year, as a rolling, 12-month total.

Applicable Compliance Method

Compliance shall be demonstrated through the record\_keeping requirements of Additional Special Terms and Conditions XV.B., and OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. 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 so 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. Alternative, formulation data may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation

Employ only non-photochemically reactive materials.

Applicable Compliance Method

Exclusion of materials meeting the definition in OAC 3745-21-01(C)(5).

**E. Miscellaneous Requirements**

1. None.

XVI. P010, Miscellaneous Solvents, plantwide use of photochemically reactive solvents

**A. Operational Restrictions**

1. The permittee shall employ only dispensers and disposal containers appropriate to minimize exposure times.

**B. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. the company identification for each photochemically reactive cleanup material employed;

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- b. the number of gallons of each photochemically reactive cleanup material employed;
- c. the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;
- d. the total organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly organic compound emission rate for all photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average); and,
- g. the monthly emissions of OC and the rolling, 12-month summation of the monthly emissions.

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

**C. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,
  - b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) in Section XVI.A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation  
  
8 pounds of VOC per hour and 40 pounds of VOC per day.  
  
Applicable Compliance Method  
  
OAC rules 3745-21-09(B) and 3745-21-10(C). USEPA Methods 24 and 24A shall be used to determine the VOC content. Alternate, equivalent methods may be used upon approval by the

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Toledo Division of Environmental Services. 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 so 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. Compliance shall be demonstrated through the recordkeeping requirements of Additional Special Terms and Conditions XVI.B.

b. Emission Limitation

5.1 tons VOC/year.

Applicable Compliance Method

Compliance shall be demonstrated through the record\_keeping requirements of Additional Special Terms and Conditions XVI.B.

**E. Miscellaneous Requirements**

1. None.

XVII. Additional terms for make up air units which are >10 MMBtu/hr & natural gas direct fired, B011 to B031

**A. Operational Restrictions**

1. The permittee shall restrict the fuel burned in this emissions unit to 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.

**B. Monitoring and/or Record Keeping Requirements**

1. None.

**C. Reporting Requirements**

1. None.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) in Section XVII.A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following methods(s):

a. Emission Limitation

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.

Applicable Compliance Method

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The exclusive use of commercially available natural gas will be considered adequate demonstration of compliance.

b. Emission Limitation

0.02 pound of carbon monoxide emissions per MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be based upon an emission factor of 0.02 pound/MMBtu (20 lb/mmscf / 1020 Btu/scf). This emission factor is specified in USEPA FIRE software v6.24 .

c. Emission Limitation

0.1 0.1 pound of nitrogen oxides emissions per MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be based upon an emission factor of 0.1 pound/MMBtu (100 lb/mmscf / 1020 Btu/scf). This emission factor is specified in USEPA FIRE software v6.24 .

d. Emission Limitation

0.0052 pound of VOC emissions per MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be based upon an emission factor of 0.0052 pound/MMBtu (5.3 lb/mmscf / 1020 Btu/scf). This emission factor is specified in USEPA FIRE software v6.24.

**E. Miscellaneous Requirements**

1. None.

XVIII. P011, BIW Inspection and Grinding

**A. Operational Restrictions**

1. Visible particulate emissions shall not exceed 20 percent opacity, except for a period of time not to exceed three minutes during any 60-minute observation period.
2. The permittee shall install and use hoods, fans, and/or other equipment to adequately enclose, contain,

capture, vent and control the fugitive dust.

**B. Monitoring and/or Record Keeping Requirements**

1. None.

**C. Reporting Requirements**

1. None.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) in Section XVIII.A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following methods(s):

- a. Emission Limitation

Adequate enclosure and control.

Applicable Compliance Method

Collection efficiency sufficient to minimize or eliminate visible particulate: OAC rule 3745-17-08(C)(1), and 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions: OAC rule 3745-17-03(B). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- b. Emission Limitation

20 percent opacity, except for a period of time not to exceed three minutes.

Applicable Compliance Method

OAC rule 3745-17-03(B)(3). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- c. Emission Limitation

0.48 pound PM<sub>10</sub>/hour and 2.1 tons PM<sub>10</sub>/year.

Applicable Compliance Method

Compliance with the adequate enclosure and control, and opacity limitations will be considered adequate demonstration of compliance.

**E. Miscellaneous Requirements**

1. None.

**XIX. P012, Finish Welding**

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**A. Operational Restrictions**

1. Visible particulate emissions shall not exceed 20 percent opacity, except for a period of time not to exceed three minutes during any 60-minute observation period.
2. The permittee shall install and use hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent and control the fugitive dust.

**B. Monitoring and/or Record Keeping Requirements**

1. None.

**C. Reporting Requirements**

1. None.

**D. Testing Requirements**

1. Compliance with the emission limitation(s) in Section XIX.A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following methods(s):

a. Emission Limitation

Adequate enclosure and control.  
Applicable Compliance Method

Collection efficiency sufficient to minimize or eliminate visible particulate: OAC rule 3745-17-08(C)(1), and 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions: OAC rule 3745-17-03(B). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation

20 percent opacity, except for a period of time not to exceed three minutes.

Applicable Compliance Method

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

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0.56 pound PM<sub>10</sub>/hour and 2.4 tons PM<sub>10</sub>/year.

Applicable Compliance Method

Compliance with the adequate enclosure and control, and opacity limitations will be considered adequate demonstration of compliance.

**E. Miscellaneous Requirements**

1. None.

**XX. F001, Plant Roadways and Parking Areas**

**A. Additional Terms and Conditions**

1. All roadways and parking areas shall be paved.
2. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Paved roadways:

Loop Road,  
T/C/F Avenue 3,  
Paint Avenue 4,  
Body Avenue 5,  
Office Road - Existing Plant.

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Paved parking areas:

- Truck marshalling Lot A,
- Truck marshalling Lot B,
- North Parking Lot,
- South Parking Lot,
- West Parking Lot,
- Visitor Parking Lot
- Shipping Lot A
- Shipping Lot B

3. Upon start-up, the permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
4. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
5. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
6. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

**B. Operational Restrictions**

1. No visible particulate emissions except for 1 minute during any 60-minute period for paved roadways and parking areas.

**C. Monitoring and/or Record Keeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all	weekly

The purpose of the inspections is to determine the need for implementing the control measures specified in Section A.2. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if

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precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

2. The permittee shall maintain records of the following information for a minimum of five years:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and,
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in Section XX.C.2.d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section XX.B.1 of the Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

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a. Emission Limitation

No visible particulate emissions except for 1 minute during any 60-minute period for paved roadways and parking areas.

Applicable Compliance Method

Compliance with these emissions limitations shall be demonstrated through the monitoring and record keeping requirements of Sections XX.C. If required, compliance shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation

0.32 pounds PM<sub>10</sub>/hour and 1.4 tons PM<sub>10</sub>/year.

Applicable Compliance Method

Compliance with the paving, sweeping, adequate moisture and opacity limitations will be considered adequate demonstration of compliance.

**F. Miscellaneous Requirements**

None.