

**STAFF DETERMINATION FOR THE APPLICATION TO CONSTRUCT
UNDER THE PREVENTION OF SIGNIFICANT DETERIORATION REGULATIONS
FOR KENWORTH TRUCK COMPANY
CHILLECOTHE, OHIO
PTI NUMBER 06-07572**

March 31, 2005

Ohio Environmental Protection Agency
Division of Air Pollution Control
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

The Clean Air Act and regulations promulgated thereunder require that major air pollution sources undergoing construction or modification comply with all applicable Prevention of Significant Deterioration (PSD) provisions and nonattainment area New Source Review requirements. The federal PSD rules govern emission increases in attainment areas for major sources, which are sources with the potential to emit 250 tons per year or more of any pollutant regulated under the Clean Air Act, or 100 tons per year or more if the source is included in one of 28 source categories. In nonattainment areas, the definition of major source is one having at least 100 tons per year potential emissions. A major modification is one resulting in a contemporaneous increase in emissions which exceeds the significance level of one or more pollutants. Any changes in actual emissions within a five-year period are considered to be contemporaneous. In addition, Ohio now has incorporated the PSD and NSR requirements by rule under OAC 3745-31.

Both PSD and nonattainment rules require that certain analyses be performed before a facility can obtain a permit authorizing construction of a new source or major modification to a major source. The principal requirements of the PSD regulations are:

- 1) Best Available Control Technology (BACT) review - A detailed engineering review must be performed to ensure that BACT is being installed for the pollutants for which the new source is a major source.
- 2) Ambient Air Quality Review - An analysis must be completed to ensure the continued maintenance of the National Ambient Air Quality Standards (NAAQS) and that any increases in ambient air pollutant concentrations do not exceed the incremental values set pursuant to the Clean Air Act.

For nonattainment areas, the requirements are:

- 1) Lowest Achievable Emissions Rate (LAER) - New major sources must install controls that represent the lowest emission levels (highest control efficiency) that has been achieved in practice.
- 2) The emissions from the new major source must be offset by a reduction of existing emissions of the same pollutant by at least the same amount, and a demonstration must be made that the resulting air quality shows a net air quality benefit. This is more completely described in the Emission Offset Interpretative Ruling as found in Appendix S of 40 CFR Part 51.
- 3) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing State Implementation Plan (SIP) or are on an approved schedule resulting in full compliance with the SIP.

For rural ozone nonattainment areas, the requirements are:

- 1) LAER - New major sources must install controls that represent the lowest emissions levels (highest control efficiency) that has been achieved in practice.
- 2) The facility must certify that all major sources owned or operated in the state by the same entity are either in compliance with the existing SIP or are on an approved schedule resulting in full compliance with the SIP.

Finally, New Source Performance Standards (NSPS), SIP emission standards and public participation requirements must be followed in all cases.

Site Description

The facility is in Chillicothe, Ohio, which is located in Ross County. This area is classified as attainment for all of the criteria pollutants, particulate matter less than 10 microns, sulfur dioxide, nitrogen oxides, carbon monoxide, volatile organic compounds (ozone) and lead.

Facility Description and Project Introduction

Kenworth Truck Company (Kenworth) proposes to replace the existing paint department with a new paint department (cab paint system) at its existing facility at 65 Kenworth Drive, Chillicothe, Ohio 45601. The project will include the installation of new emissions units. The units to be installed are 2 robotic booth paint lines, 1 manual booth paint line, 1 drying oven, and 2 sanding stations.

New Source Review (NSR)/PSD Applicability

This process will generate significant levels of criteria pollutant emissions for VOC. For PSD purposes, the Kenworth facility is already considered a major facility. A PSD analysis is required for any increase in emissions of a pollutant exceeding the PSD threshold emissions level, or the significance levels. Non-Attainment New Source Review is not applicable, due to attainment status for ozone.

Currently Kenworth is not subject to MACT or NSPS. .

Short term emissions from this Project are based upon worst case operating conditions. The annual emissions are based on pounds per hour emissions operated to achieve BACT.

TABLE 1

PRELIMINARY POLLUTANT EMISSION RATES MODIFICATION TO INCREASE EMISSION RATES Kenworth

<u>AIR POLLUTANT</u>	<u>TOTAL TPY INCREASE</u>	<u>TOTAL TPY ALLOWABLE</u>	<u>PSD THRESHOLD</u>
NO _x	9.2	9.2	40
CO	2.28	2.28	100
PM/PM ₁₀	0.379/0.083	0.379/0.083	25/15

Control Technology Review

As part of the application for any source regulated under the PSD requirements, an analysis must be conducted that demonstrates that Best Available Control Technology (BACT) will be employed by the source. The Kenworth facility is subject to PSD regulations which mandate a case-by-case BACT analysis be performed for PSD triggering pollutants. The application used a "top-down" approach to determine the latest demonstrated control techniques and select an appropriate level of control.

The basic steps to be followed are:

Identify all available potential control options;

Eliminate technically infeasible options;

Rank remaining technologies by control effectiveness;

Evaluate the feasible controls by performance and cost analysis; and

Select the most effective control based on energy, environmental and economic impacts (generally, the feasible technology that is also considered to be cost effective).

VOC

VOC will be emitted by the operation of the equipment associated to this project by the spray painting of both metal and fiberglass (primarily) parts and through combustion of natural gas. The VOC as mentioned above will be emitted over the significance thresholds for PSD review. As part of that review Kenworth evaluated 4 control options to reduce emission and satisfy BACT. The range of control options available for VOC is summarized in the following table:

VOC Control Technology	Control Efficiency
Thermal Incinerator - recuperative	98 to 99%
Thermal Incinerator - regenerative	95 to 99%
Catalytic Incineration	95 to 99%
Biofilters	????
Carbon Adsorption	95 to 99%
Condensation	up to 90%

Upon review of these options carbon adsorption, biofilters, recuperative oxidation, and condensation were deemed technically infeasible.

The following list describes the reasons:

- 1.) Carbon adsorption is not feasible due to the low VOC concentrations per volume of air flow. The result would be very low control efficiency because the adsorption mechanism would not be functioning properly.
- 2.) Biofilters are not feasible according to vendors because the VOC components are too variable for the biologically active material to adapt quickly enough to control the gas stream.

- 3.) Recuperative thermal incineration was declared as infeasible due to the necessary air flow for the painting system being outside of the air flow range of the oxidizer.
- 4.) Condensation is not feasible for the same reason that carbon absorption was found to be infeasible.

This leaves regenerative oxidation and catalytic oxidation as the remaining viable options. Kenworth performed cost analysis to determine which control mechanism would be appropriate if any. As a result catalytic oxidation was deemed cost ineffective. Under many scenarios regenerative oxidation was deemed cost ineffective as well; however, under the scenario of only controlling a portion of the robotic lines was cost effective.

Due to the analysis above, BACT was determined to be the use of a regenerative thermal oxidizer on the robotic portions of the line along with voluntary restriction to reflect how Kenworth actually intends to operate.

Ambient Air Quality Monitoring Requirements

The area where the Kenworth facility is located is attainment for all criteria pollutants. Kenworth did not trigger requirements to perform an ambient air quality monitoring.

Modeling

Air quality dispersion modeling was conducted to assess the effect of this installation to determine if the project would result in adverse health consequences per state policies. NO_x was modeled to half the PSD increment and various air toxics were evaluated according to Ohio's air toxics policy. Screen 3 was used to perform this analysis.

Predicted impacts of toxics and NO_x were below all thresholds of concern.

Increment

Only state increment modeling was necessary due to the amounts of pollutant generated.

NAAQS

Kenworth's project did not trigger the need to do NAAQS impact analysis.

Secondary Impact Analysis

Kenworth has determined that there will be no secondary impact due to contributions of this project.

Soil and Vegetation: No adverse impact upon soils or vegetation is expected.

Visibility: The Kenworth facility is located nearly 450 miles from the closest class I area. Primary or secondary pollutants associated with this project are not anticipated to affect local or class I visibility.

Conclusions

Based upon the review of the permit to install application and the supporting documentation provided by the applicant, the Ohio EPA staff has determined the installation will comply with all applicable State and Federal environmental regulations and that the requirements for BACT are satisfied. Therefore, the Ohio EPA staff recommends that a permit to install be issued to the Kenworth facility for the installation of the paint department described in the PTI #06-07572 permit recommendation.

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL
SUBJECT TO PREVENTION OF SIGNIFICANT DETERIORATION REVIEW
FOR KENWORTH TRUCK COMPANY

Public Notice is hereby given that the Staff of the Ohio Environmental Protection Agency (EPA) has recommended to the Director that Ohio EPA issue a draft action of a Permit to Install (PTI) to Kenworth Truck Company (Kenworth) in Ross County, Ohio.

This draft permit proposes to build a new truck cab painting operation in Chillicothe, Ohio. The project will include the installation of 1 manual coating line, 2 robotic coating lines, 1 drying oven, and 2 sanding stations. The allowable emissions are in tons per year:

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	9.2
CO	2.28
VOC	113.89
PE	0.379
PM-10	0.083

This facility is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by U.S. EPA (40 CFR 52.21).

A draft action (permit no. 06-07572) was issued on (March 31, 2005). Within 30 days from the date of this notice, any interested party may submit comments or request a public hearing. Comments are to be sent to Dan Canter, Ohio Environmental Protection Agency, Southeast District Office, 2195 Front Street, Logan, Ohio, 43138.

Further information concerning this application, which is available for public inspection, may be secured from Dan Canter at the Ohio Environmental Protection Agency, Southeast District Office at the above address during normal business hours. Telephone number: (740) 380-8501.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
ROSS COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 06-07572

Fac ID: 0671010121

DATE: 3/31/2005

Kenworth Truck Co.
Kenneth Legner
65 Kenworth Dr.
Chillicothe, OH 45601

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the 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 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 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 a fee of **\$800** 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.

Sincerely,

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

CC: USEPA

SEDO

KY

ROSS COUNTY

PUBLIC NOTICE ISSUANCE OF DRAFT PERMIT TO INSTALL SUBJECT TO PREVENTION OF SIGNIFICANT DETERIORATION REVIEW FOR KENWORTH TRUCK COMPANY

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Further information concerning this application, which is available for public inspection, may be secured from Dan Canter at the Ohio Environmental Protection Agency, Southeast District Office at the above address during normal business hours. Telephone number: (740) 380-8501.



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 06-07572

Application Number: 06-07572
Facility ID: 0671010121
Permit Fee: **To be entered upon final issuance**
Name of Facility: Kenworth Truck Co.
Person to Contact: Kenneth Legner
Address: 65 Kenworth Dr.
Chillicothe, OH 45601

Location of proposed air contaminant source(s) [emissions unit(s)]:
**65 Kenworth Dr.
Chillicothe, Ohio**

Description of proposed emissions unit(s):
Robotic Cab Booths Line 1.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Kenworth Truck Co.

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Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Permit To Operate Application

- a. 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).
- b. 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.

11. 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.

12. Air Pollution Nuisance

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

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

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

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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.

5. Construction of New Sources(s)

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

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

6. 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.

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

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if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.379
PM10	0.083
VOC	113.89
NOx	9.2
CO	2.28

Kenworth Truck Co.

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. Facility Emission Limitation.

Pursuant to OAC rule 3745-31-05(C), the wipe solvent (VOC-based cleanup material) cleanup material usage shall be limited such that the maximum annual VOC usage for all emissions units at this facility shall not exceed ~~X~~ 39.4 tons, based upon a rolling, 12-month summation of the VOC usage for the wipe solvent cleanup materials. For the purpose of this usage limitation, VOC usage is equivalent to VOC emissions.

2. Facility Monitoring and/or Record Keeping Requirements.

The permittee shall collect and record the following information each month:

- a. The name and identification number of each wipe solvent cleanup material used at the facility.
- b. Whether or not each wipe solvent cleanup material employed in emissions units K023, K024, and K025 is a photochemically reactive material.
- c. The number of gallons of each wipe solvent cleanup material employed, in gallons.
- d. The VOC content of each wipe solvent cleanup material employed, in pounds per gallon.
- e. The VOC emissions for each wipe solvent cleanup material employed, in pounds or tons.
- f. The total VOC emissions for all wipe solvent cleanup materials employed, in pounds or tons.
- g. The rolling, 12-month summation of the VOC emissions for all wipe solvent cleanup materials employed, in tons.

3. Facility Reporting Requirements.

The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the VOC emissions from the wipe solvent cleanup material usage exceeded the rolling, 12-month emission limitation, and the actual VOC emissions for each such month.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

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4. Facility Testing Requirements.

Emission Limitation:

VOC emissions from the use of all wipe solvent cleanup materials at this facility shall not exceed ~~X~~ 39.4 tons per year based upon a rolling, 12-month summation of the wipe solvent cleanup material usage rate.

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitation shall be demonstrated based upon the record keeping requirements specified in Part II - Section A.2.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emission Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P001 - 6.3 MMBTU/hr cab drying oven with low-NOx burner, which includes common flash tunnel serving robotic line 1 (K023), robotic line 2 (K024), and the manual line (K025).	OAC rule 3745-31-05(A)(3)
Emissions from paint continuing to dry from the coatings applied in the basecoat (B/C) and clearcoat (C/C) booths of emissions units K023, K024, and K025.	OAC rule 3745-17-07(A)(1)

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OAC rule 3745-17-11(B)(1) OAC rule 3745-18-06(E)(2)	Applicable Emission <u>Limitations/Control Measures</u>	
OAC rule 3745-21-07(B) OAC rule 3745-21-08(B) OAC rule 3745-23-06(B)	The emissions from the combustion of natural gas in this emissions unit shall not exceed the following:	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 18.70 lbs/hr when operating emissions units K023, K024, and K025.
OAC rules 3745-31-10 through 3745-31-20	Nitrogen oxides (NO _x) emissions shall not exceed 0.32 lb/hr and 1.4 TPY.	VOC emissions from this emissions unit shall not exceed 8.31 lbs/hr when only operating emissions unit K023.
	Carbon monoxide (CO) emissions shall not exceed 0.52 lb/hr and 2.28 TPY.	VOC emissions from this emissions unit shall not exceed 8.31 lbs/hr when only operating emissions unit K024.
	PE, SO ₂ , and VOC from natural gas combustion are emitted below one ton so these pollutants are not limited in this permit.	VOC emissions from this emissions unit shall not exceed 2.08 lbs/hr when only operating emissions unit K025.
	See section A.I.2.b below.	VOC emissions from this emissions unit shall not exceed 19.95 tons per rolling, 12-month period.
	No visible particulate emissions shall be exhausted from the stack(s) serving this emissions unit.	See section A.I.2.a below.
	Compliance with this rule also includes compliance with OAC rules 3745-31-10 through 3745-31-20.	
	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).	
	See section A.I.2.c below.	

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2. Additional Terms and Conditions

- 2.a** As part of the BACT determination for this permit, the permittee has requested voluntary restrictions of VOC emissions.
- 2.b** The hourly and annual emission limitations from natural gas combustion are based on the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

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

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-23-06(B) and 3745-21-07(B) by committing to comply with the best available technology requirements established in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** For purposes of calculating the VOC emission rates for this emissions unit and the associated spray booths (the B/C and C/C booths of emissions units K023, K024, and K025), the permittee shall utilize a value of 96% as the maximum percentage of the VOCs employed in the spray booths that are either vented to a control system or emitted uncontrolled from the spray booths (the VOC emissions from the B/C and C/C booths of emissions units K023, K024 are controlled by a thermal oxidizer). The remaining 4% of the VOCs employed in the spray booths shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of VOC emissions between this emissions unit and the associated spray booth is based upon engineering evaluations provided by the permittee and may be revised based upon the data collected during the initial compliance demonstration.

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II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. To ensure enforceability with the annual VOC emission limitation during the first 12 calendar months of operation following the startup of this emissions unit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons)</u>
1	1.7
1-2	3.4
1-3	5.1
1-4	6.8
1-5	8.5
1-6	10.2
1-7	11.9
1-8	13.6
1-9	15.3
1-10	17.0
1-11	18.7
1-12	19.95

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

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions unit K023, in pounds or tons.
 - b. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions unit K024, in pounds or tons.
 - c. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions unit K025, in pounds or tons.

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- d. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions units K023, K024, and K025, combined, in pounds or tons.
- e. The total uncontrolled VOC emissions for this emissions unit, in pounds or tons (i.e., the value from (d) multiplied by a value of 4% (or the percentage established during the initial compliance demonstration)).
- f. During the first 12 calendar months of operation following the startup of this emissions unit, the cumulative VOC emissions for each calendar month, in tons.
- g. After the first 12 calendar months of operation following the startup of this emissions unit, the rolling, 12-month summation of the total VOC emissions from this emissions unit, in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All periods of time when a fuel other than natural gas was burned in this emissions unit.
 - b. During the first 12 calendar months of operation following the startup of this emissions unit, any exceedances of the cumulative VOC emission limitations.
 - c. After the first 12 calendar months of operation following the startup of this emissions unit, any exceedances of the rolling, 12-month VOC emission limitation.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

NOx emissions shall not exceed 0.32 lb/hr and 1.4 TPY.

Applicable Compliance Methods:

Compliance with the NOx emission limitations may be demonstrated by use of the AP-42 (7/98), emission factor (table 1.4-1., for natural gas combustion) and the calculations shown below:

$$(0.05 \text{ lb/MMBTU})(6.3 \text{ MMBTU/hr}) = 0.32 \text{ lb/hr}$$

$$(0.32 \text{ lb/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 1.4 \text{ TPY}$$

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

b. Emission Limitations:

CO emissions shall not exceed 0.52 lb/hr and 2.28 TPY.

Compliance Methods:

Compliance with the CO emission limitations may be demonstrated by use of the AP-42 (7/98), emission factor (table 1.4-1., for natural gas combustion) and the calculations shown below:

$$(0.083 \text{ lb/MMBTU})(6.3 \text{ MMBTU/hr}) = 0.52 \text{ lb/hr}$$

$$(0.52 \text{ lb/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 2.28 \text{ TPY}$$

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

c. Emission Limitation:

No visible particulate emissions shall be exhausted from the stack(s) serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

d. Emission Limitations:

VOC emissions from this emissions unit shall not exceed 18.70 lbs/hr when operating emissions units K023, K024, and K025.

VOC emissions from this emissions unit shall not exceed 8.31 lbs/hr when only operating emissions unit K023.

VOC emissions from this emissions unit shall not exceed 8.31 lbs/hr when only operating

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emissions unit K024.

VOC emissions from this emissions unit shall not exceed 2.08 lbs/hr when only operating emissions unit K025.

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the hourly emission limitation(s) when emissions unit(s) K023 and/or K024 are in operation in accordance with the emission testing requirements contained in section A.V.2.

If required, the permittee shall demonstrate compliance with the hourly emission limitations when emissions units K023, K024, and K025 are in operation or when only emissions unit K025 is in operation through emission testing performed in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). Alternative USEPA- approved test methods may be used with prior approval from the Ohio EPA.

e. Emission Limitation:

VOC emissions shall not exceed 19.95 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the recordkeeping requirements contained in section A.III.

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 60 days after reaching full production, but not later than 180 days after initial startup following the installation of the emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the VOC emission limitation(s) when emissions unit(s) K023 and/or K024 are in operation.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
 - i. The hourly VOC emission limitation shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). 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.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

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- d. The tests shall be conducted while this emissions unit and emissions unit(s) K023 and/or K024 is (are) operating at or near its (their) maximum capacity (capacities), unless otherwise specified or approved by the Ohio EPA, Southeast District Office (SEDO) or Central Office (CO).
- e. All monitoring systems and equipment shall be installed, operational, and calibrated prior to the emission tests.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, SEDO. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to testing may result in the Ohio EPA, SEDO's or CO's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA, SEDO or CO shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, SEDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, SEDO or CO.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emission Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emission Limitations/Control Measures</u>
	None	None

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emission Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	
K023 - Robotic cab booths Line #1	
Spot prime (S/P) booth,, controlled by paint arrester.	
	B/C and C/C booths, controlled by venturi waterwash, dry filter, and thermal oxidizer.
	S/P, B/C, C/C booth emissions for K023 and K024

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B/C, CC booth emissions for K023, K024, and K025 controlled/uncontrolled combined VOC emissions from cleanup material in the B/C and C/C booths.

Applicable Rules/Requirements

OAC rule 3745-31-05(A)(3)

OAC rules 3745-31-10 through 3745-31-20

OAC rule 3745-21-09(U)(1)(c)

OAC rule 3745-17-07(A)(1)
OAC rule 3745-17-11(B)(1)

OAC rule 3745-21-07(G)(2)

OAC rule 3745-31-05(A)(3)

OAC rules 3745-31-10 through 3745-31-20

OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(U)(1)(c) for the controlled portion of this coating line.

OAC rule 3745-17-07(A)(1)
OAC rule 3745-17-11(B)(1)

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	<u>Applicable Emission Limitations/Control Measures</u>	3745-31-05(A)(3).
OAC rule 3745-21-07(G)(2)		See section A.I.2.c below.
OAC rules 3745-31-10 through 3745-31-20	Visible PE from the exhaust stack serving the S/P booth shall not exceed 5% opacity as a 6-minute average.	Particulate emissions (PE) shall not exceed 0.002 lb/hr and 0.008 TPY.
	Particulate emissions (PE) shall not exceed 0.036 lb/hr and 0.16 TPY.	PM ₁₀ emissions shall not exceed 0.002 lb/hour and 0.008 TPY.
	PM ₁₀ emissions shall not exceed 0.007 lb/hour and 0.032 TPY.	Visible PE from the exhaust stack serving the B/C and C/C booths shall not exceed 5% opacity as a 6-minute average.
	See section A.I.2.b below.	See section A.I.2.b below.
	VOC emissions from the coatings employed in the S/P booth shall not exceed X 0.82 lbs/hr.	The emissions from the combustion of natural gas in the thermal oxidizer shall not exceed the following:
	VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for each coating employed in the S/P booth.	NOx emissions shall not exceed 1.78 lbs/hr and 7.8 TPY.
	The requirements for the uncontrolled portion of this emissions unit established pursuant to this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-10 through 20.05(A)(3).	CO emissions shall not exceed 0.18 lbs/hr and 0.79 TPY.
	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule	PE, SO ₂ , CO, and VOC from natural gas combustion are emitted below one ton so these pollutants are not limited in this permit.
		See section A.I.2.d below.
		VOC emissions shall not exceed 3.43 lbs/hr, including the emissions from the water-based and VOC-based cleanup materials.
		See sections A.II.7 and A.II.9 below.
		The emission limitation specified by this

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rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.05(A)(3).

The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

See section A.I.2.c below.

VOC emissions from the coatings employed in emissions units K023 and K024, combined, shall not exceed 7.74 tons per rolling, 12-month period.

VOC emissions from the cleanup materials employed in B/C and C/C booths of emissions units K023, K024, and K025, combined, shall not exceed **X** 5.75 tons per rolling, 12-month period.

See section A.I.2.a below.

2. Additional Terms and Conditions

- 2.a** As part of the BACT determination for this permit, the permittee has requested voluntary restrictions of VOC emissions.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20.
- 2.c** The permittee shall not employ any photochemically reactive materials in this emissions unit. Pursuant to OAC rule 3745-21-07(G)(9)(f), this emissions unit is exempt from the emission limitations and control requirements specified in OAC rule 3745-21-07(G)(2).

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- 2.d** The hourly and annual emission limitations from natural gas combustion are based on the emissions unit's potentials to emit. Therefore, no additional monitoring record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
- 2.e** For purposes of calculating the VOC emission rates for this emissions unit and the associated oven (emissions unit P001), the permittee shall utilize a value of 96% as the maximum percentage of the VOCs employed in this emissions unit that are vented to a control system. The remaining 4% of the VOCs employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of VOC emissions between this emissions unit and the associated oven spray booth is based upon engineering evaluations provided by the permittee and may be revised based upon the data collected during the initial compliance demonstration.

II. Operational Restrictions

1. The permittee shall operate the paint arrester for control of particulate emissions from the S/P booth at all times the emissions unit is in operation.
2. The pressure drop across the paint arrester controlling the S/P booth shall be maintained within the range of 0.15 to 1.0 inch of water column while the emissions unit is in operation.
3. The permittee shall operate the venturi waterwash and dry filter for control of PE from the B/C and C/C booths at all times the emissions unit is in operation.
4. The pressure drop across the venturi waterwash controlling the B/C and C/C booths shall be maintained within the range of 4.5 to 5.5 inches of water column while the emissions unit is in operation.
5. The pressure drop across the dry filter controlling the B/C and C/C booths shall be maintained within the range of 0.25 to 1.5 inches of water column while the emissions unit is in operation.
6. The permittee shall operate the thermal oxidizer for control of VOC emissions from the B/C and C/C booths at all times that the emissions unit is in operation.
7. All of the VOC emissions generated in the B/C and C/C booths shall be captured and vented to the thermal oxidizer.
8. The average combustion temperature in the thermal oxidizer controlling the B/C and C/C booths, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emission

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tests that demonstrated that the emissions unit was in compliance. A minimum combustion temperature of 1,250 degrees Fahrenheit shall be used until the initial emission tests are completed.

9. The VOC control (destruction) efficiency of the thermal oxidizer controlling the B/C and C/C booths shall be equal to or greater than 97%, by weight, while the emissions unit is in operation.
10. To ensure enforceability with the annual VOC emission limitation from the coatings employed in emissions units K023 and K024 combined during the first 12 calendar months of operation following the startup of emissions units K023 and K024 and the annual VOC emission limitation from the cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025 combined during the first 12 calendar months of operation following the startup of emissions units K023, K024, and K025, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons) From Coatings employed in K023 and K024</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons) From cleanup material employed in K023, K024, and K025</u>
1	0.7	0.48
1 - 2	1.4	0.96
1 - 3	2.1	1.44
1 - 4	2.8	1.92
1 - 5	3.5	2.40
1 - 6	4.2	2.87
1 - 7	4.9	3.35
1 - 8	5.6	3.83
1 - 9	6.3	4.31
1 - 10	7.0	4.79
1 - 11	7.74	5.27
1 - 12	7.74	5.75

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer serving the B/C and C/C booths when either booth is in operation. Units shall be measured in degrees

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Fahrenheit. 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.

2. In order to ensure that all VOC emissions are vented from the B/C and C/C booths to the thermal oxidizer, the permittee will utilize an electrical interlock system which will be associated with the ventilation fans (supply, recirculating, and exhaust) and man-door openings of each booth. If the electric input to any of the ventilation fans varies by more than plus or minus 8 Hz* from the electric input set points used during the initial emission tests that demonstrated that the emissions unit was in compliance (or the electric input set points used in subsequent emission tests that demonstrated that the emissions unit was in compliance), or if any man-door associated with these booths is opened (as indicated by an electric trigger switch) when the booths are in operation, then the paint applicators associated with these booths will be shutdown until the electric input to the affected ventilation fan(s) is restored to the appropriate level or until any man-door is closed. The permittee shall install, operate, and maintain equipment to continuously monitor and record the electrical input to the ventilation fans associated with the B/C and C/C booths. The permittee shall also install, operate, and maintain equipment to continuously monitor and record the status of the man-doors (i.e., opened or closed during operation of the B/C and C/C booths) associated with the B/C and C/C booths. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

* Since "plus or minus 8 Hz from the electric input set points" was based upon an educated estimate by the facility's engineering contractor, a more appropriate set point and/or variation range may be established during the initial compliance demonstration or during initial set-up for the emissions unit. If approved by Ohio EPA, a more appropriate set point and/or variation range shall be utilized and written into the facility's Title V permit.

3. The permittee shall install, operate, and maintain equipment to continuously monitor the pressure drops across the paint arrester serving the S/P booth and the venturi water wash system(s) and dry filter(s) serving the B/C and C/C booths when the booths are in operation. The monitoring equipment shall be capable of accurately measuring the desired parameter. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The pressure drop readings for each piece of equipment shall be recorded on a once per day basis.
4. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. A log or record of the downtime for the capture (collection) system, control device (thermal oxidizer), and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees

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- Fahrenheit below the average temperature in the operation restriction above.
- c. All time periods when the emissions unit was in operation and the electric input to any of the ventilation fans serving the B/C and C/C booths deviated by more than plus or minus 8 Hz, or an Ohio EPA-approved alternative set point and/or variation range, and the paint applicators associated with these booths were not shutdown.
 - d. All time periods when the emissions unit was in operation and any man-door serving the B/C and C/C booths was open and the paint applicators associated with these booths were not shutdown.
 - e. The pressure drop across the paint arrester serving the S/P booth, in inches of water.
 - f. The pressure drop across the venturi water wash serving the B/C and C/C booths, in inches of water.
 - g. The pressure drop across the dry filter serving the B/C and C/C booths, in inches of water.
 - h. All time periods when the emissions unit was in operation and the paint arrester serving the S/P booth was not in service.
 - i. All time periods when the emissions unit was in operation and the venturi water wash serving the B/C and C/C booths was not in service.
 - j. All time periods when the emissions unit was in operation and the dry filter serving the B/C and C/C booths was not in service.
5. The permittee shall collect and record the following information each month for the S/P booth associated with this coating line:
- a. The name and identification number of each coating, as applied, in the S/P booth.
 - b. Whether or not each coating employed in the S/P booth is a photochemically reactive material.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in the S/P booth, in pounds per gallon.
 - d. The volume of each coating employed in the S/P booth, in gallons.
 - e. The total VOC emissions from all coatings employed in the S/P booth, in pounds or tons.
 - f. The total number of hours the S/P booth was in operation.
 - g. The average hourly VOC emission rate for all coatings employed in the S/P booth, in pounds or tons.
- this emissions unit and coatings S/P, ,the summation of A.III.5.h and coatings S/P, ,the summation of A.iii.? and used during the initial emission tests that demonstrated that the emissions unit was in compliance (or the electric input set points and variation range established in subsequent emission tests that demonstrated that the emissions unit was in compliance) limitation.
6. The permittee shall collect and record the following information each month for the B/C and C/C booths associated with this coating line:
- a. The name and identification number of each coating and cleanup material, as applied, in the B/C and C/C booths.
 - b. Whether or not each coating and cleanup material employed in the B/C and C/C booths is a photochemically reactive material.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in

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- the B/C and C/C booths, in pounds per gallon.
- d. The volume of each coating employed in the B/C and C/C booths, in gallons.
 - e. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths, in pounds or tons.
 - f. The total uncontrolled VOC emission rate for all coatings employed in the B/C and C/C booths, in pounds or tons (i.e., the value from (e) multiplied by the percentage of VOC employed in the B/C and C/C booths that are vented to the control system from the B/C and C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - g. The total calculated, controlled VOC emission rate for all coatings employed in the B/C and C/C booths, in pounds or tons (value from (f) multiplied by 1 minus the overall control efficiency established during the most recent emission tests that demonstrated that the emissions unit was in compliance (or a value of 97% until the initial compliance demonstration is performed)).
 - h. The VOC content of each cleanup material employed in the B/C and C/C booths, in pounds per gallon.
 - i. The volume of each cleanup material employed in the B/C and C/C booths, in gallons.
 - j. The uncontrolled VOC emissions from all cleanup materials employed in the B/C and C/C booths, in pounds or tons.
 - k. The total uncontrolled VOC emission rate for all cleanup materials employed in the B/C and C/C booths, in pounds or tons (i.e., the value from (e) multiplied by the percentage of VOC employed in the B/C and C/C booths that are vented to the control system from the B/C and C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - l. The calculated, controlled VOC emissions from all cleanup materials employed in the B/C and C/C booths, in pounds or tons (value from (j) multiplied by 1 minus the overall control efficiency established during the most recent emission tests that demonstrated that the emissions unit was in compliance (or a value of 97% until the initial compliance demonstration is performed)).
 - m. The total calculated, controlled VOC emission rate for all coatings and cleanup materials employed in the B/C and C/C booths, in pounds or tons (the summation of the values from (g) and (k) above).
 - n. The total number of hours the B/C and C/C booths were in operation.
 - o. The average hourly controlled VOC emission rate for all coatings and cleanup materials employed in the B/C and C/C booths, in pounds or tons (the value from (l) divided by (m)).
7. The permittee shall collect and record the following information each month for emissions units K023 and K024:
- a. The total VOC emissions from all coatings employed in the S/P, B/C, and C/C booths

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- associated with this emissions unit (the summation of the values from A.III.5.e and A.III.6.g).
- b. The total VOC emissions from all coatings employed in the S/P, B/C, and C/C booths associated with emissions unit K024 (the summation of the values from A.III.5.e and A.III.6.g of K024's records).
 - c. During the first 12 months after the startup of emissions units K023 and K024, the total cumulative VOC emissions from all coatings employed in emissions units K023 and K024.
 - d. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions from all coatings employed in emissions units K023 and K024.
 - e. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K023 (the value from A.III.6.l of K023's records).
 - f. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K024 (the value from A.III.6.l of K024's records).
 - g. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K025 (the value from A.III.6.k of K025's records).
 - h. During the first 12 months after the startup of emissions units K023, K024, and K025, the total cumulative VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.
 - i. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
 - a. All periods of time when the emissions unit was in operation and the paint arrester controlling the S/P booth was not in service.
 - b. All periods of time when the pressure drop across the paint arrester controlling the S/P booth was outside of the allowable range specified above.
 - c. All periods of time when the emissions unit was in operation and the venturi waterwash and dry filter controlling the B/C and C/C booths were not in service.
 - d. All periods of time when the pressure drop across the venturi waterwash controlling the B/C and C/C booths was outside of the allowable range specified above.
 - e. All periods of time when the pressure drop across the dry filter controlling the B/C and C/C booths was outside of the allowable range specified above.
 - f. All periods of time when the emissions unit was in operation and the thermal oxidizer controlling the B/C and C/C booths was not in service.
 - g. All 3-hour blocks of time when the emissions unit was in operation, that the average combustion temperature in the thermal oxidizer did not comply with the temperature limitation specified above.
 - h. All days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds.

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- i. All periods of time when the electric input to any of the ventilation fans varied by more than plus or minus 8 Hz from the electric input set points (or an Ohio EPA-approved alternative set point and/or variation range) specified above and the paint applicators associated with these booths were not shutdown.
- j. All periods of time when any man-door associated with these booths was opened (as indicated by an electric trigger switch) when the booths were in operation and the paint applicators associated with these booths were not shutdown.
- k. Any monthly record showing the use of noncomplying coatings, including coatings that have a VOC content greater than 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied, for each coating employed in the S/P booth.
- l. Any monthly record showing that the average hourly VOC emission rate from all coatings employed in the S/P booth exceeded the applicable emission limitation.
- m. Any monthly record showing that the average hourly VOC emission rate from all coatings and cleanup materials employed in the B/C and C/C booths exceeded the applicable emission limitation.
- n. During the first 12 months after the startup of emissions units K023 and K024, any exceedances of the total cumulative VOC emission limitations from all coatings employed in emissions units K023 and K024.
- o. After the first 12 months of operation following the issuance of this permit, any exceedances of the rolling, 12-month emission limitation for the combined VOC emissions from all coatings employed in emissions units K023 and K024.
- p. During the first 12 months after the startup of emissions units K023 and K024, any exceedances of the total cumulative VOC emission limitations from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.
- q. After the first 12 months of operation following the issuance of this permit, any exceedances of the rolling, 12-month emission limitation for the combined VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible PE from the exhaust stack serving the S/P booth shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with Method 9 of

40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions from the coatings employed in the S/P booth shall not exceed 0.82 lbs/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and the appropriate method(s) specified in OAC rule 3745-21-10(C) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

VOC-based cleanup materials (wipe solvents) will be employed in the S/P booth during the emission test period. Because the wipe solvent usage and corresponding emissions are tracked on a facility-wide basis (all wipe solvent used is assumed to be emitted) and this emission limitation only addresses the emissions from the coatings employed in the S/P booth, the permittee may quantify the total emissions associated with the wipe solvent usage during the emission test period and adjust the results of the individual test runs accordingly. The permittee shall maintain records of the wipe solvent usage and the corresponding emissions for any adjustments made during the emission test period.

c. Emission Limitation:

VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for each coating employed in the S/P booth.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the record keeping requirements specified in section A.III. Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC content of the coatings.

d. Emission Limitation:

VOC emissions from the B/C and C/C booths shall not exceed 3.43 lbs/hr, including emissions from the water-based and VOC-based cleanup materials.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the emission testing requirements contained in section A.V.2.

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e. Emission Limitations:

NOx emissions from the combustion of natural gas in the thermal oxidizer shall not exceed 1.78 lbs/hr and 7.8 TPY.

Applicable Compliance Methods:

If required, compliance with the hourly emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The tons per year emission limitation was developed by multiplying the hourly allowable NOx emission limitation (1.78 lbs/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the hourly emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

VOC emissions from all coatings employed in emissions units K023 and K024, combined, shall not exceed 7.74 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

h. Emission Limitation:

VOC emissions from the cleanup materials employed in B/C and C/C booths of emissions units K023, K024, and K025, combined, shall not exceed 5.75 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

i. Emission Limitation:

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PE shall not exceed 0.036 lb/hr and 0.16 TPY from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PE limitation (0.036 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

PM₁₀ emissions shall not exceed 0.007 lb/hour and 0.032 TPY from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PM₁₀ limitation (0.007 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

PE shall not exceed 0.002 lb/hr and 0.008 TPY from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PE limitation (0.002 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

l. Emission Limitation:

PM₁₀ emissions shall not exceed 0.002 lb/hour and 0.008 TPY from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other USEPA approved test method, with prior approval from the Ohio EPA.

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Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PM₁₀ limitation (0.002 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m.. Emission Limitation:

Visible PE shall not exceed 5% opacity from the exhaust stack as a 6-minute average, from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after reaching full production, but not later than 180 days after initial startup following installation of the emissions units.
 - b. The emission testing shall be conducted to demonstrate compliance with the hourly VOC emission limitation, VOC control (destruction) efficiency of the thermal oxidizer, and to confirm total capture of the VOC emissions from the B/C and C/C booths.
 - c. The following test methods shall be employed to demonstrate compliance with the emission limitation and control requirements:
 - i. for the hourly VOC emission limitation and VOC control efficiency requirements, Methods 1 through 4 and the appropriate method(s) specified in OAC rule 3745-21-10(C), 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; and
 - ii. for VOC capture, the permittee shall demonstrate initial compliance by showing that there is constant inflow of air throughout the openings into the B/C and C/C booths, using a velocity meter, streamers, smoke tubes, tracer gases, or other

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means with prior approval from the Ohio EPA.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The tests shall be conducted while emissions units K023 and/or K024 are operating at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office (SEDO) or Central Office (CO).
- e. All monitoring systems and equipment shall be installed, operational, and calibrated prior to the emission tests.
- f. The permittee shall monitor and record the average combustion temperature within the thermal oxidizer at least every 15 minutes during the emission tests. The arithmetic average for the average combustion temperature shall be calculated using all of the recorded measurements collected during the compliance demonstration.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, SEDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to testing may result in the Ohio EPA, SEDO's or CO's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA, SEDO or CO shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, SEDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, SEDO or CO.

VI. Miscellaneous Requirements

None.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K023 - Robotic cab booths Line #1	None	None

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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PTI A

Emissions Unit ID: K024

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property,
and/or Equipment

K024 - Robotic cab booths
Line #2

Spot prime (S/P) booth,
controlled by paint arrester.

B/C and C/C booths, controlled by
venturi waterwash, dry filter, and
thermal oxidizer.

S/P, B/C, C/C booth emissions for K023
and K024

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Applicable Rules/Requirements

B/C, CC booth emissions for K023, K024, and K025 controlled/uncontrolled combined VOC emissions from cleanup material in the B/C and C/C booths.

OAC rule 3745-31-05(A)(3)

OAC rules 3745-31-10 through 3745-31-20

OAC rule 3745-21-09(U)(1)(c)

OAC rules 3745-31-10 through 3745-31-20

OAC rule 3745-17-07(A)(1)
OAC rule 3745-17-11(B)(1)

OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(U)(1)(c) for the controlled portion of this coating line.

OAC rule 3745-21-07(G)(2)

OAC rule 3745-17-07(A)(1)
OAC rule 3745-17-11(B)(1)

OAC rule 3745-31-05(A)(3)

OAC rule 3745-21-07(G)(2)

OAC rules 3745-31-10 through 3745-31-20

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<u>Applicable Emission Limitations/Control Measures</u>	3745-31-10 through 20.	See sections A.II.7 and A.II.9 below.
Visible PE from the exhaust stack serving the S/P booth shall not exceed 5% opacity as a 6-minute average.	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
Particulate emissions (PE) shall not exceed 0.036 lb/hr and 0.16 TPY.	See section A.I.2.c below.	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
PM ₁₀ emissions shall not exceed 0.007 lb/hour and 0.032 TPY.	Particulate emissions (PE) shall not exceed 0.002 lb/hr and 0.008 TPY.	See section A.I.2.c below.
See section A.I.2.b below.	PM ₁₀ emissions shall not exceed 0.002 lb/hour and 0.008 TPY.	VOC emissions from the coatings employed in emissions units K023 and K024, combined, shall not exceed 7.74 tons per rolling, 12-month period.
VOC emissions from the coatings employed in the S/P booth shall not exceed 0.82 lbs/hr.	Visible PE from the exhaust stack serving the B/C and C/C booths shall not exceed 5% opacity as a 6-minute average.	VOC emissions from the cleanup materials employed in B/C and C/C booths of emissions units K023, K024, and K025, combined, shall not exceed 5.75 tons per rolling, 12-month period.
VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for each coating employed in the S/P booth.	See section A.I.2.b below.	See section A.I.2.a below.
The requirements for the uncontrolled portion of this emissions unit established pursuant to this rule are equivalent to the requirements established pursuant to OAC rule	The emissions from the combustion of natural gas in the thermal oxidizer shall not exceed the following:	
	NO _x emissions shall not exceed 1.78 lbs/hr and 7.8 TPY.	
	PE, SO ₂ , CO, and VOC from natural gas combustion are emitted below one ton so these pollutants are not limited in this permit.	
	See section A.I.2.d below.	
	VOC emissions shall not exceed 3.43 lbs/hr, including the emissions from the water-based and VOC-based cleanup materials.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** As part of the BACT determination for this permit, the permittee has requested voluntary restrictions of VOC emissions.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20.
- 2.c** The permittee shall not employ any photochemically reactive materials in this emissions unit. Pursuant to OAC rule 3745-21-07(G)(9)(f), this emissions unit is exempt from the emission limitations and control requirements specified in OAC rule 3745-21-07(G)(2).
- 2.d** The hourly and annual emission limitations from natural gas combustion are based on the emissions unit's potentials to emit. Therefore, no additional monitoring record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.
- 2.e** For purposes of calculating the VOC emission rates for this emissions unit and the associated oven (emissions unit P001), the permittee shall utilize a value of 96% as the maximum percentage of the VOCs employed in this emissions unit that are vented to a control system. The remaining 4% of the VOCs employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This "split" of VOC emissions between this emissions unit and the associated oven is based upon engineering evaluations provided by the permittee and may be revised based upon the data collected during the initial compliance demonstration.

II. Operational Restrictions

- 1. The permittee shall operate the paint arrester for control of particulate emissions from the S/P booth at all times the emissions unit is in operation.
- 2. The pressure drop across the paint arrester controlling the S/P booth shall be maintained within the range of 0.15 to 1.0 inch of water column while the emissions unit is in operation.
- 3. The permittee shall operate the venturi waterwash and dry filter for control of PE from the B/C and C/C booths at all times the emissions unit is in operation.
- 4. The pressure drop across the venturi waterwash controlling the B/C and C/C booths shall be maintained within the range of 4.5 to 5.5 inches of water column while the emissions unit is in operation.

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5. The pressure drop across the dry filter controlling the B/C and C/C booths shall be maintained within the range of 0.25 to 1.5 inches of water column while the emissions unit is in operation.
6. The permittee shall operate the thermal oxidizer for control of VOC emissions from the B/C and C/C booths at all times that the emissions unit is in operation.
7. All of the VOC emissions generated in the B/C and C/C booths shall be captured and vented to the thermal oxidizer.
8. The average combustion temperature in the thermal oxidizer controlling the B/C and C/C booths, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance. A minimum combustion temperature of 1,250 degrees Fahrenheit shall be used until the initial emission tests are completed.
9. The VOC control (destruction) efficiency of the thermal oxidizer controlling the B/C and C/C booths shall be equal to or greater than 97%, by weight, while the emissions unit is in operation.
10. To ensure enforceability with the annual VOC emission limitation from the coatings employed in emissions units K023 and K024 combined during the first 12 calendar months of operation following the startup of emissions units K023 and K024 and the annual VOC emission limitation from the cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025 combined during the first 12 calendar months of operation following the startup of emissions units K023, K024, and K025, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons) From Coatings employed in K023 and K024</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons) From cleanup material employed in K023, K024, and K025</u>
1	0.7	0.48
1 - 2	1.4	0.96
1 - 3	2.1	1.44
1 - 4	2.8	1.92
1 - 5	3.5	2.40
1 - 6	4.2	2.87
1 - 7	4.9	3.35
1 - 8	5.6	3.83
1 - 9	6.3	4.31
1 - 10	7.0	4.79
1 - 11	7.74	5.27
1 - 12	7.74	5.75

After the first 12 calendar months of operation following issuance of this permit, compliance with

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the annual VOC emission limitation shall be based upon a rolling, 12-month summation of the monthly emission figures.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer serving the B/C and C/C booths when either booth is in operation. Units shall be measured in degrees Fahrenheit. 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.
2. In order to ensure that all VOC emissions are vented from the B/C and C/C booths to the thermal oxidizer, the permittee will utilize an electrical interlock system which will be associated with the ventilation fans (supply, recirculating, and exhaust) and man-door openings of each booth. If the electric input to any of the ventilation fans varies by more than plus or minus 8 Hz* from the electric input set points used during the initial emission tests that demonstrated that the emissions unit was in compliance (or the electric input set points used in subsequent emission tests that demonstrated that the emissions unit was in compliance), or if any man-door associated with these booths is opened (as indicated by an electric trigger switch) when the booths are in operation, then the paint applicators associated with these booths will be shutdown until the electric input to the affected ventilation fan(s) is restored to the appropriate level or until any man-door is closed. The permittee shall install, operate, and maintain equipment to continuously monitor and record the electrical input to the ventilation fans associated with the B/C and C/C booths. The permittee shall also install, operate, and maintain equipment to continuously monitor and record the status of the man-doors (i.e., opened or closed during operation of the B/C and C/C booths) associated with the B/C and C/C booths. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

* Since "plus or minus 8 Hz from the electric input set points" was based upon an educated estimate by the facility's engineering contractor, a more appropriate set point and/or variation range may be established during the initial compliance demonstration or during initial set-up for the emissions unit. If approved by Ohio EPA, a more appropriate set point and/or variation range shall be utilized and written into the facility's Title V permit.
3. The permittee shall install, operate, and maintain equipment to continuously monitor the pressure drops across the paint arrester serving the S/P booth and the venturi water wash system(s) and dry filter(s) serving the B/C and C/C booths when the booths are in operation. The monitoring

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equipment shall be capable of accurately measuring the desired parameter. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. A log or record of the downtime for the capture (collection) system, control device (thermal oxidizer), and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature in the operation restriction above.
 - c. All time periods when the emissions unit was in operation and the electric input to any of the ventilation fans serving the B/C and C/C booths deviated by more than plus or minus 8 Hz, or an Ohio EPA-approved alternative set point and/or variation range, and the paint applicators associated with these booths were not shutdown.
 - d. All time periods when the emissions unit was in operation and any man-door serving the B/C and C/C booths was open and the paint applicators associated with these booths were not shutdown.
 - e. The pressure drop across the paint arrester serving the S/P booth, in inches of water.
 - f. The pressure drop across the venturi water wash serving the B/C and C/C booths, in inches of water.
 - g. The pressure drop across the dry filter serving the B/C and C/C booths, in inches of water.
 - h. All time periods when the emissions unit was in operation and the paint arrester serving the S/P booth was not in service.
 - i. All time periods when the emissions unit was in operation and the venturi water wash serving the B/C and C/C booths was not in service.
 - j. All time periods when the emissions unit was in operation and the dry filter serving the B/C and C/C booths was not in service.
5. The permittee shall collect and record the following information each month for the S/P booth associated with this coating line:
 - a. The name and identification number of each coating, as applied, in the S/P booth.
 - b. Whether or not each coating employed in the S/P booth is a photochemically reactive material.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in the S/P booth, in pounds per gallon.
 - d. The volume of each coating employed in the S/P booth, in gallons.
 - e. The total VOC emissions from all coatings employed in the S/P booth, in pounds or tons.
 - f. The total number of hours the S/P booth was in operation.
 - g. The average hourly VOC emission rate for all coatings employed in the S/P booth, in pounds or tons.
6. The permittee shall collect and record the following information each month for the B/C and C/C

booths associated with this coating line:

- a. The name and identification number of each coating and cleanup material, as applied, in the B/C and C/C booths.
 - b. Whether or not each coating and cleanup material employed in the B/C and C/C booths is a photochemically reactive material.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in the B/C and C/C booths, in pounds per gallon.
 - d. The volume of each coating employed in the B/C and C/C booths, in gallons.
 - e. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths, in pounds or tons.
 - f. The total uncontrolled VOC emission rate for all coatings employed in the B/C and C/C booths, in pounds or tons (i.e., the value from (e) multiplied by the percentage of VOC employed in the B/C and C/C booths that are vented to the control system from the B/C and C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - g. The total calculated, controlled VOC emission rate for all coatings employed in the B/C and C/C booths, in pounds or tons (value from (f) multiplied by 1 minus the overall control efficiency established during the most recent emission tests that demonstrated that the emissions unit was in compliance (or a value of 97% until the initial compliance demonstration is performed)).
 - h. The VOC content of each cleanup material employed in the B/C and C/C booths, in pounds per gallon.
 - i. The volume of each cleanup material employed in the B/C and C/C booths, in gallons.
 - j. The uncontrolled VOC emissions from all cleanup materials employed in the B/C and C/C booths, in pounds or tons.
 - k. The total uncontrolled VOC emission rate for all cleanup materials employed in the B/C and C/C booths, in pounds or tons (i.e., the value from (e) multiplied by the percentage of VOC employed in the B/C and C/C booths that are vented to the control system from the B/C and C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - l. The calculated, controlled VOC emissions from all cleanup materials employed in the B/C and C/C booths, in pounds or tons (value from (j) multiplied by 1 minus the overall control efficiency established during the most recent emission tests that demonstrated that the emissions unit was in compliance (or a value of 97% until the initial compliance demonstration is performed)).
 - m. The total calculated, controlled VOC emission rate for all coatings and cleanup materials employed in the B/C and C/C booths, in pounds or tons (the summation of the values from (g) and (k) above).
 - n. The total number of hours the B/C and C/C booths were in operation.
 - o. The average hourly controlled VOC emission rate for all coatings and cleanup materials employed in the B/C and C/C booths, in pounds or tons (the value from (l) divided by (m)).
7. The permittee shall collect and record the following information each month for emissions units K023 and K024:

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- a. The total VOC emissions from all coatings employed in the S/P, B/C, and C/C booths associated with this emissions unit (the summation of the values from A.III.5.e and A.III.6.g).
- b. The total VOC emissions from all coatings employed in the S/P, B/C, and C/C booths associated with emissions unit K024 (the summation of the values from A.III.5.e and A.III.6.g of K024's records).
- c. During the first 12 months after the startup of emissions units K023 and K024, the total cumulative VOC emissions from all coatings employed in emissions units K023 and K024.
- d. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions from all coatings employed in emissions units K023 and K024.
- e. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K023 (the value from A.III.6.l of K023's records).
- f. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K024 (the value from A.III.6.l of K024's records).
- g. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K025 (the value from A.III.6.k of K025's records).
- h. During the first 12 months after the startup of emissions units K023, K024, and K025, the total cumulative VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.
- i. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
 - a. All periods of time when the emissions unit was in operation and the paint arrester controlling the S/P booth was not in service.
 - b. All periods of time when the pressure drop across the paint arrester controlling the S/P booth was outside of the allowable range specified above.
 - c. All periods of time when the emissions unit was in operation and the venturi waterwash and dry filter controlling the B/C and C/C booths were not in service.
 - d. All periods of time when the pressure drop across the venturi waterwash controlling the B/C and C/C booths was outside of the allowable range specified above.
 - e. All periods of time when the pressure drop across the dry filter controlling the B/C and C/C booths was outside of the allowable range specified above.
 - f. All periods of time when the emissions unit was in operation and the thermal oxidizer controlling the B/C and C/C booths was not in service.
 - g. All 3-hour blocks of time when the emissions unit was in operation, that the average combustion temperature in the thermal oxidizer did not comply with the temperature limitation specified above.
 - h. All days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive

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material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds.

- i. All periods of time when the electric input to any of the ventilation fans varied by more than plus or minus 8 Hz from the electric input set points (or an Ohio EPA-approved alternative set point and/or variation range) specified above and the paint applicators associated with these booths were not shutdown.
- j. All periods of time when any man-door associated with these booths was opened (as indicated by an electric trigger switch) when the booths were in operation and the paint applicators associated with these booths were not shutdown.
- k. Any monthly record showing the use of noncomplying coatings, including coatings that have a VOC content greater than 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied, for each coating employed in the S/P booth.
- l. Any monthly record showing that the average hourly VOC emission rate from all coatings employed in the S/P booth exceeded the applicable emission limitation.
- m. Any monthly record showing that the average hourly VOC emission rate from all coatings and cleanup materials employed in the B/C and C/C booths exceeded the applicable emission limitation.
- n. During the first 12 months after the startup of emissions units K023 and K024, any exceedances of the total cumulative VOC emission limitations from all coatings employed in emissions units K023 and K024.
- o. After the first 12 months of operation following the issuance of this permit, any exceedances of the rolling, 12-month emission limitation for the combined VOC emissions from all coatings employed in emissions units K023 and K024.
- p. During the first 12 months after the startup of emissions units K023 and K024, any exceedances of the total cumulative VOC emission limitations from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.
- q. After the first 12 months of operation following the issuance of this permit, any exceedances of the rolling, 12-month emission limitation for the combined VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible PE from the exhaust stack serving the S/P booth shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions from the coatings employed in the S/P booth shall not exceed 0.82 lbs/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and the appropriate method(s) specified in OAC rule 3745-21-10(C) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

VOC-based cleanup materials (wipe solvents) will be employed in the S/P booth during the emission test period. Because the wipe solvent usage and corresponding emissions are tracked on a facility-wide basis (all wipe solvent used is assumed to be emitted) and this emission limitation only addresses the emissions from the coatings employed in the S/P booth, the permittee may quantify the total emissions associated with the wipe solvent usage during the emission test period and adjust the results of the individual test runs accordingly. The permittee shall maintain records of the wipe solvent usage and the corresponding emissions for any adjustments made during the emission test period.

c. Emission Limitation:

VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for each coating employed in the S/P booth.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the record keeping requirements specified in section A.III. Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC content of the coatings.

d. Emission Limitation:

VOC emissions from the B/C and C/C booths shall not exceed 3.43 lbs/hr, including emissions from the water-based and VOC-based cleanup materials.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the

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emission testing requirements contained in section A.V.2.

e. Emission Limitations:

NO_x emissions from the combustion of natural gas in the thermal oxidizer shall not exceed 1.78 lbs/hr and 7.8 TPY.

Applicable Compliance Methods:

If required, compliance with the hourly emission limitation shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The tons per year emission limitation was developed by multiplying the hourly allowable NO_x emission limitation (1.78 lbs/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lbs/ton. Therefore, if compliance is shown with the hourly emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

VOC emissions from all coatings employed in emissions units K023 and K024, combined, shall not exceed 7.74 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

h. Emission Limitation:

VOC emissions from the cleanup materials employed in B/C and C/C booths of emissions units K023, K024, and K025, combined, shall not exceed 5.75 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

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i. Emission Limitation:

PE shall not exceed 0.036 lb/hr and 0.16 TPY from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PE limitation (0.036 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

j. Emission Limitation:

PM₁₀ emissions shall not exceed 0.007 lb/hour and 0.032 TPY from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PM₁₀ limitation (0.007 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

PE shall not exceed 0.002 lb/hr and 0.008 TPY from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the

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hourly allowable PE limitation (0.002 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

l. Emission Limitation:

PM₁₀ emissions shall not exceed 0.002 lb/hour and 0.008 TPY from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PM₁₀ limitation (0.002 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

m.. Emission Limitation:

Visible PE shall not exceed 5% opacity from the exhaust stack as a 6-minute average, from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after reaching full production, but not later than 180 days after initial startup following installation of the emissions units.

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- b. The emission testing shall be conducted to demonstrate compliance with the hourly VOC emission limitation, VOC control (destruction) efficiency of the thermal oxidizer, and to confirm total capture of the VOC emissions from the B/C and C/C booths.
 - c. The following test methods shall be employed to demonstrate compliance with the emission limitation and control requirements:
 - i. for the hourly VOC emission limitation and VOC control efficiency requirements, Methods 1 through 4 and the appropriate method(s) specified in OAC rule 3745-21-10(C), 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; and
 - ii. for VOC capture, the permittee shall demonstrate initial compliance by showing that there is constant inflow of air throughout the openings into the B/C and C/C booths, using a velocity meter, streamers, smoke tubes, tracer gases, or other means with prior approval from the Ohio EPA.
- Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests shall be conducted while emissions units K023 and/or K024 are operating at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office (SEDO) or Central Office (CO).
 - e. All monitoring systems and equipment shall be installed, operational, and calibrated prior to the emission tests.
 - f. The permittee shall monitor and record the average combustion temperature within the thermal oxidizer at least every 15 minutes during the emission tests. The arithmetic average for the average combustion temperature shall be calculated using all of the recorded measurements collected during the compliance demonstration.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, SEDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to testing may result in the Ohio EPA, SEDO's or CO's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA, SEDO or CO shall be permitted to witness the tests, 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

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control equipment.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, SEDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, SEDO or CO.

VI. Miscellaneous Requirements

None.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K024 - Robotic Cab Booths Line #2	None	None
Spot Prime (S/P) Booth, controlled by paint arrester.		
Base Coat (B/C) and Clear Coat (C/C) Booths, controlled by venturi waterwash, dry filter, and thermal oxidizer.		

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

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V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>controlled by venturi waterwash</u>	<u>Applicable Rules/Requirements</u>
K025 - Manual Cab Booths Line		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-17-07(A)(1) OAC rule 3745-17-11(B)(1)
	VOC emissions at the S/P Booth, uncontrolled.	OAC rule 3745-21-07(G)(2)
Spot Prime (S/P) Booth, controlled by paint arrester.	VOC emissions at the B/C and C/C Booths, uncontrolled.	OAC rule 3745-31-05(A)(3)
	Combined VOC emissions from the S/P booth and B/C and C/C booths.	
Base Coat (B/C) and Clear Coat (C/C) Booths,		

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Applicable Emissions
Limitations/Control Measures

VOC emissions shall not exceed 0.21
lbs/hr, including Wipe Solvents.

VOC emissions shall not exceed 28.58
lbs/hr, including Polychem and Parcosol

The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-31-10 through 3745-31-20.

VOC emissions shall not exceed 41.05
tons per rolling 12-month period,
excluding Polychem and Wipe Solvents
(tracked on a facility-wide basis).

OAC rule 3745-31-10
through 20

The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

VOC emissions shall not exceed 3.5
pounds per gallon of coating, excluding
water & exempt solvents, for each coating
employed.

See section A.I.2.c below.

PE shall not exceed 0.009 lb/hr and
0.04 TPY.

See section A.I.2.a below.

PM₁₀ emissions shall not exceed
0.002 lb/hour and 0.008 TPY.

Visible PE shall not exceed 5%
opacity from the exhaust stack
serving the S/P booth as a 6-minute
average.

See section A.I.2.b below.

PE shall not exceed 0.001 lb/hr and
0.003 TPY.

PM₁₀ emissions shall not exceed
0.001 lb/hour and 0.003 TPY.

Visible PE shall not exceed 5%
opacity from the exhaust stack as a
6-minute average.

See section A.I.2.b below.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** As part of the BACT determination for this permit, the permittee has requested voluntary restrictions of VOC emissions.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20.
- 2.c** The permittee shall not employ any photochemically reactive materials in this emissions unit. Pursuant to OAC rule 3745-21-07(G)(9)(f), this emissions unit is exempt from the emission limitations and control requirements specified in OAC rule 3745-21-07(G)(2).

II. Operational Restrictions

1. The permittee shall operate the paint arrester for control of particulate emissions from the S/P booth at all times the emissions unit is in operation.
2. The pressure drop across the paint arrester controlling the S/P booth shall be maintained within the range of 0.15 to 1.0 inch of water column while the emissions unit is in operation.
3. The permittee shall operate the venturi waterwash and dry filter for control of PE from the B/C and C/C booths at all times the emissions unit is in operation.
4. The pressure drop across the venturi waterwash controlling the B/C and C/C booths shall be maintained within the range of 4.5 to 5.5 inches of water column while the emissions unit is in operation.
5. The pressure drop across the dry filter controlling the B/C and C/C booths shall be maintained within the range of 0.25 to 1.5 inches of water column while the emissions unit is in operation.
6. To ensure enforceability with the annual VOC emission limitation from the coatings employed in emissions unit K025 during the first 12 calendar months of operation following the startup of emissions unit K025 and the annual VOC emission limitation from the cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025 combined during the first 12 calendar months of operation following the startup of emissions units K023, K024, and K025, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons) From Coatings employed in K023 and K024</u>	<u>Maximum Allowable Cumulative VOC Emissions (Tons) From cleanup material employed in K023, K024, and K025</u>

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1	3.42	0.48
1 - 2	6.84	0.96
1 - 3	10.26	1.44
1 - 4	13.68	1.92
1 - 5	17.10	2.40
1 - 6	20.52	2.87
1 - 7	23.94	3.35
1 - 8	27.36	3.83
1 - 9	30.78	4.31
1 - 10	34.20	4.79
1 - 11	37.62	5.27
1 - 12	41.05	5.75

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate, and maintain equipment to continuously monitor the pressure drops across the paint arrester serving the S/P booth and the venturi water wash system(s) and dry filter(s) serving the B/C and C/C booths when the booths are in operation. The monitoring equipment shall be capable of accurately measuring the desired parameter. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. The pressure drop across the paint arrester serving the S/P booth, in inches of water.
 - b. The pressure drop across the venturi water wash serving the B/C and C/C booths, in inches of water.
 - c. The pressure drop across the dry filter serving the B/C and C/C booths, in inches of water.
 - d. All time periods when the emissions unit was in operation and the paint arrester serving the S/P booth was not in service.
 - e. All time periods when the emissions unit was in operation and the venturi water wash serving the B/C and C/C booths was not in service.
 - f. All time periods when the emissions unit was in operation and the dry filter serving the B/C and C/C booths was not in service.
3. The permittee shall collect and record the following information each month for the S/P booth associated with this coating line:
 - a. The name and identification number of each coating, as applied, in the S/P booth.
 - b. Whether or not each coating employed in the S/P booth is a photochemically reactive

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- material.
- c. The VOC content of each coating (excluding water and exempt solvents), as applied, in the S/P booth, in pounds per gallon.
 - d. The volume of each coating employed in the S/P booth, in gallons.
 - e. The total VOC emissions from all coatings employed in the S/P booth, in pounds or tons.
 - f. The total number of hours the S/P booth was in operation.
 - g. The average hourly VOC emission rate for all coatings employed in the S/P booth, in pounds or tons.
4. The permittee shall collect and record the following information each month for the B/C and C/C booths associated with this coating line:
- a. The name and identification number of each coating and cleanup material, as applied, in the B/C and C/C booths.
 - b. Whether or not each coating and cleanup material employed in the B/C and C/C booths is a photochemically reactive material.
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied, in the B/C and C/C booths, in pounds per gallon.
 - d. The volume of each coating employed in the B/C and C/C booths, in gallons.
 - e. The VOC emissions from all coatings employed in the B/C and C/C booths, in pounds or tons.
 - f. The total VOC emission rate for all coatings employed in the B/C and C/C booths, in pounds or tons (i.e., the value from (e) multiplied by the percentage of VOC employed in the B/C and C/C booths that are vented to the control system from the B/C and C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - h. The VOC content of each cleanup material employed in the B/C and C/C booths, in pounds per gallon.
 - i. The volume of each cleanup material employed in the B/C and C/C booths, in gallons.
 - j. The VOC emissions from all cleanup materials employed in the B/C and C/C booths, in pounds or tons.
 - k. The total VOC emission rate for all cleanup material employed in the B/C and C/C booths, in pounds or tons (i.e., the value from (e) multiplied by the percentage of VOC employed in the B/C and C/C booths that are vented to the control system from the B/C and C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - l. The total calculated, controlled VOC emission rate for all coatings and cleanup materials employed in the B/C and C/C booths, in pounds or tons (the summation of the values from (g) and (k) above).
 - m. The total number of hours the B/C and C/C booths were in operation.
 - n. The average hourly controlled VOC emission rate for all coatings and cleanup materials

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employed in the B/C and C/C booths, in pounds or tons (the value from (l) divided by (m)).

5. The permittee shall collect and record the following information each month for emissions unit K025:
 - a. The total VOC emissions from all coatings employed in the S/P, B/C, and C/C booths associated with this emissions unit (the summation of the values from A.III.5.e and A.III.6.l).
 - b. During the first 12 months after the startup of emissions units K023 and K024, the total cumulative VOC emissions from all coatings employed in emissions units K023 and K024.
 - c. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions from all coatings employed in emissions units K023 and K024.
 - d. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K023 (the value from A.III.6.k of K023's records).
 - e. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K024 (the value from A.III.6.k of K024's records).
 - f. The total VOC emissions from all cleanup materials employed in the B/C and C/C booths associated with emissions unit K025 (the value from A.III.6.k of K025's records).
 - g. During the first 12 months after the startup of emissions units K023 and K024, the total cumulative VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.
 - h. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the combined VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
 - a. All periods of time when the emissions unit was in operation and the paint arrester controlling the S/P booth was not in service.
 - b. All periods of time when the pressure drop across the paint arrester controlling the S/P booth was outside of the allowable range specified above.
 - c. All periods of time when the emissions unit was in operation and the venturi waterwash and dry filter controlling the B/C and C/C booths were not in service.
 - d. All periods of time when the pressure drop across the venturi waterwash controlling the B/C and C/C booths was outside of the allowable range specified above.
 - e. All periods of time when the pressure drop across the dry filter controlling the B/C and C/C booths was outside of the allowable range specified above.
 - f. All days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds.
 - h. Any monthly record showing the use of noncomplying coatings, including coatings that

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- have a VOC content greater than 3.5 lbs of VOC/gallon of coating, excluding water and exempt solvents, as applied, for each coating employed in the S/P booth.
- i. Any monthly record showing that the average hourly VOC emission rate from all coatings employed in the S/P booth exceeded the applicable emission limitation.
 - j. Any monthly record showing that the average hourly VOC emission rate from all coatings and cleanup materials employed in the B/C and C/C booths exceeded the applicable emission limitation.
 - k. During the first 12 months after the startup of emissions unit K025, any exceedances of the total cumulative VOC emission limitations from all coatings employed in emissions unit K025.
 - l. After the first 12 months of operation following the issuance of this permit, any exceedances of the rolling, 12-month emission limitation for the VOC emissions from all coatings employed in emissions unit K025.
 - m. During the first 12 months after the startup of emissions units K023, K024, and K025, any exceedances of the total cumulative VOC emission limitations from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.
 - n. After the first 12 months of operation following the issuance of this permit, any exceedances of the rolling, 12-month emission limitation for the combined VOC emissions from all cleanup materials employed in the B/C and C/C booths of emissions units K023, K024, and K025.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible PE from the exhaust stack serving the S/P booth shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:

VOC emissions from the coatings employed in the S/P booth shall not exceed 0.21 lbs/hr.

Applicable Compliance Method:

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The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and the appropriate method(s) specified in OAC rule 3745-21-10(C) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

VOC-based cleanup materials (wipe solvents) will be employed in the S/P booth during the emission test period. Because the wipe solvent usage and corresponding emissions are tracked on a facility-wide basis (all wipe solvent used is assumed to be emitted) and this emission limitation only addresses the emissions from the coatings employed in the S/P booth, the permittee may quantify the total emissions associated with the wipe solvent usage during the emission test period and adjust the results of the individual test runs accordingly. The permittee shall maintain records of the wipe solvent usage and the corresponding emissions for any adjustments made during the emission test period.

c. Emission Limitation:

VOC emissions shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for each coating employed in the S/P booth.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the record keeping requirements specified in section A.III. Method 24 of 40 CFR Part 60, Appendix A or formulation data shall be used to determine the VOC content of the coatings.

d. Emission Limitation:

VOC emissions from the B/C and C/C booths shall not exceed 28.58 lbs/hr, including emissions from the water-based and VOC-based cleanup materials.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and the appropriate method(s) specified in OAC rule 3745-21-10(C) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

e. Emission Limitation:

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VOC emissions from all coatings employed in emissions unit K025, combined, shall not exceed 41.05 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

f. Emission Limitation:

VOC emissions from the cleanup materials employed in B/C and C/C booths of emissions units K023, K024, and K025, combined, shall not exceed 5.75 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation through the record keeping requirements contained in section A.III.

g. Emission Limitation:

PE shall not exceed 0.009 lb/hr and 0.040 TPY from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PE limitation (0.009 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

PM₁₀ emissions shall not exceed 0.002 lb/hour and 0.008 TPY from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other USEPA approved test method, with prior approval

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from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PM₁₀ limitation (0.002 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

Visible PE shall not exceed 5% opacity from the exhaust stack as a 6-minute average, from the S/P booth.

Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 9 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

j. Emission Limitation:

PE shall not exceed 0.001 lb/hr and 0.003 TPY from the B/C and C/C booths.

Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Method 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PE limitation (0.001 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

PM₁₀ emissions shall not exceed 0.001 lb/hour and 0.003 TPY from the B/C and C/C booths.

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Compliance Method:

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M, or other USEPA approved test method, with prior approval from the Ohio EPA.

Compliance with the tons per year emission limitation was developed by multiplying the hourly allowable PM₁₀ limitation (0.001 lb/hour) by the maximum annual hours of operation (8,760 hour/year), and then dividing by 2,000 lb/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

VI. Miscellaneous Requirements

None.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K025 - Manual Cab Booths Line	None	None
Spot Prime (S/P) Booth, controlled by paint arrester.		
Base Coat (B/C) and Clear Coat (C/C) Booths, controlled by venturi waterwash		

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

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V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.