



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 06-08317

Fac ID: 0671010121

DATE: 1/29/2008

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

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

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

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

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

Sincerely,

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

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/29/2008
Effective Date: 1/29/2008**

FINAL PERMIT TO INSTALL 06-08317

Application Number: 06-08317
Facility ID: 0671010121
Permit Fee: **\$800**
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):

To install one new spot prime booth one new robotic paint line two new drying ovens and supporting operations including six PTI exempt air heaters.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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.

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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

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

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit 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.

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- 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.

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 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.

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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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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

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

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form 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., postmarked), 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 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>
VOC	166.72
PE	11.02

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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 Limitations:

- a. Pursuant to OAC rules 3745-31-10 thru 20 and 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 88.01 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.
- b. Pursuant to OAC rule 3745-31-05(C), the total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K007, K017, K018, K019, K026, K027, K028, and P002 including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for the total of all HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee shall comply with the rolling, 12-month limitation immediately upon startup under this permit based on past records of monthly HAP emissions.

2. Facility Monitoring and/or Record Keeping Requirements.

- a. The permittee shall collect and record the following information each month:
 - i. the name and identification number of each wipe solvent cleanup material used at the facility;
 - ii. whether or not each wipe solvent cleanup material employed is a photochemically reactive material;
 - iii. the amount of each wipe solvent cleanup material employed, in gallons;
 - iv. the VOC content of each wipe solvent cleanup material employed, in pounds per gallon;

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- v. the VOC emissions for each wipe solvent cleanup material employed, in pounds or tons (i.e., iii. x iv.);
 - vi. the total VOC emissions for all wipe solvent cleanup materials employed, in pounds or tons; and
 - vii. the rolling, 12-month summation of the VOC emissions for all wipe solvent cleanup materials employed, in tons.
- b. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in the emissions unit:
- i. the name and identification number/code of each coating and/or coating component, , cleanup material, solvent, and any other material containing any HAP;
 - ii. the name/identification of each individual HAP contained in each material applied (and identified in " i" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - iii. the number of gallons of each materials identified in "i" above, and other material applied during the month;
 - iv. for each individual HAP, the total uncontrolled emissions from the controlled coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of "ii" times "iii" for all the materials identified in "i" above, and other materials applied during the month, where the emissions are captured and introduced to the control system, divided by 2,000 pounds;
 - v. for each individual HAP, the total uncontrolled emissions from all the materials identified in "i" above, and other materials applied from all operations not controlled, in ton(s), i.e., for each individual HAP, the summation of the products of "ii" times "iii" for all the materials identified in "i" above applied during the month, divided by 2,000 pounds;
 - vi. the total uncontrolled combined HAPs emissions from the controlled operations for all the materials identified in "i" above, and other materials applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "iv" above;
 - vii. the total uncontrolled combined HAPs emissions from all the materials identified in "i" above, and other materials applied from all operations not

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controlled, in ton(s), i.e., the summation of all the individual HAPs emissions from "v" above;

- viii. for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the materials identified in "i" above, and other materials employed during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in "iv" above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the materials identified in "i" above, and other materials employed during the month, as calculated in "v" above;
- ix. for combined HAPs, the calculated total combined HAPs emission rate for all the materials applied during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates calculated in "viii" above;
- x. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "viii" above, for the present month plus the previous 11 months of operation, in ton(s); and
- xi. the calculated total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "ix" above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

3. Facility Reporting Requirements.

- a. 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.

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- b. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the HAP emissions from the emissions units identified in A.1.b exceeded the rolling, 12-month emission limitations, and the actual HAP 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.

a. Emission Limitation:

VOC emissions from the use of all wipe solvent cleanup materials at this facility shall not exceed 88.01 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.a.

b. Emission Limitation:

Pursuant to OAC rule 3745-31-05(C), the total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001, K007, K017, K018, K019, K021, K026, K027, K028, and P002 including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for the total of all HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

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.

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

None

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 - K026 - Robotic Cab Paint Booths Line No. 1 - Robotic Base Coat (B/C) and Clear Coat (C/C) Paint Booths controlled by Venturi Waterwash, Dry Filters, and Thermal Oxidizer - Chapter 31 Modification of PTI # 06-07879

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a and A.I.2.b.
OAC rule 3745-31-10 thru 20	VOC emissions shall not exceed 1.66 lbs/hr and 7.27 tons/yr of VOC , based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents. See A.I.2.f and A.I.2.g.
OAC rule 3745-21-07(G)(2)	See A.I.2.d.
OAC rule 3745-17-11(B)(1)	0.551 lb/hr of Particulate Emissions (PE) (see A.I.2.e and A.II.1.)
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-21-09(B)(6)	The destruction efficiency requirement contained in this rule is less stringent than the destruction efficiency established pursuant to OAC rule 3745-31-10 thru 20. The capture and control equipment must provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line. See A.I.2.c.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from this air contaminant source since the calculated annual emissions rate for VOC is less than ten tons per year taking into account the federally enforceable limits established pursuant to OAC rule 3745-31-10 thru 20.

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- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, PM10, SO2, NOX, or CO emissions from this air contaminant source since the calculated annual uncontrolled emission rate for each of these pollutants is less than 10 ton/yr.
- 2.c** The permittee has chosen to comply with this rule in lieu of OAC rule 3745-21-09(U)(1)(c) for this coating line.
- 2.d** The permittee shall not employ any photochemically reactive cleanup 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.e** The hourly PE emission limitation is greater than the emissions unit's controlled potential to emit. Therefore, no records other than those required to document proper operation of the control devices are required to demonstrate compliance with this limit.
- 2.f** For purposes of calculating the VOC emission rates for this emissions unit and the associated oven (emissions unit P002), the permittee shall utilize a value of 96% as the percentage of the VOCs employed from coatings only in this emissions unit that are vented to the Thermal Oxidizer. The remaining 4% of the VOCs employed from coatings only in this emissions unit shall be considered to be uncontrolled emissions for the associated oven, due to paint continuing to dry from the coatings applied in the B/C+C/C booths. All VOC emissions from cleanup solvents are vented to the Thermal Oxidizer in this emissions unit. 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.
- 2.g** The VOC control (destruction) efficiency of the Thermal Oxidizer controlling the B/C+C/C booths shall be equal to or greater than 97%, by weight, while the emissions unit is in operation.

II. Operational Restrictions

1. The permittee shall operate the Venturi Waterwash and Dry Filters for control of PE emissions from the B/C+C/C booths at all times this emissions unit is in operation.

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2. The permittee shall operate the Thermal Oxidizer for control of VOC emissions from the B/C+C/C booths at all times this emissions unit is in operation.
3. The average combustion temperature in the Thermal Oxidizer controlling the B/C+C/C booths, for any rolling 3-hour periods (i.e., 06:00 - 09:00, 07:00 - 10:00, etc.) 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.
4. All of the VOC emissions generated in the B/C+C/C booths shall be captured and vented to the Thermal Oxidizer (except the split of VOC emitted at the drying ovens due to paint continuing to dry from the coatings applied in the B/C+C/C booths, as discussed above, or cleaning of paint application equipment immediately following an unplanned shutdown of the paint application equipment caused by the "electrical interlock system" discussed below).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the dry filters during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the dry filters on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of

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the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the dry filters shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the venturi waterwash during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the the pressure drop, in inches of water, across the venturi waterwash on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure

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drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the venturi waterwash shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

3. The permittee shall install, operate, and maintain equipment to continuously monitor the combustion temperature within the Thermal Oxidizer serving the B/C+C/C booths when either booth is in operation. Units shall be measured in degrees Fahrenheit. 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 modification deemed necessary by the permittee.
4. In order to ensure that all VOC emissions are vented from the B/C+C/C booths to the Thermal Oxidizer, the permittee will utilize an electrical interlock system which will continuously monitor the following parameters for indication of inadequate operation (failure) of the VOC capture system when the booths are in operation:
 - a. Spot Prime Exhaust Fan (B/C+C/C inlet air):if pressure differential switch fails to close, or to remain closed, when fan reaches operating speed
 - b. B/C+C/C Booth Exhaust Fans / Abatement Feed Fans:if pressure differential switch fails to close, or to remain closed, when fan reaches operating speed
 - c. B/C+C/C Booth Recirculation Fans:if fan speed varies by more than ± 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

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points used in subsequent emission tests that demonstrated that the emissions unit was in compliance)

- d. B/C+C/C System Exhaust Dry Filter Media:if pressure differential deviates from set point either below 0.1" WC or above 1.5" WC
- e. B/C+C/C Sludge Water Interlock:if pressure differential switch or pump motor running contact fail to close, or to remain closed, during operation

If any of the above scenarios occur, the permissive to the appropriate robotic B/C and/or C/C application equipment will be removed so that the paint application will be automatically shutdown until after the affected operational parameter (and associated electrical interlock system signal) is restored to the appropriate level.

The permittee shall install, operate, and maintain equipment to continuously monitor and record the electrical input to the affected operation(s) described above associated with the B/C+C/C booths. The monitoring and recording equipment shall be capable of accurately measuring the desired parameters. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

* Since "±8 Hz from the electric input set points " was based upon an educated estimate by the facility's engineering contractor, a more appropriate setpoint 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 setpoint and/or variation range shall be utilized.

- 5. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. Any time periods when the emissions unit was in operation and the Venturi Waterwash and Dry Filters serving the B/C+C/C booths were not in service.
 - b. Any time periods when the emissions unit was in operation and the Thermal Oxidizer serving the B/C+C/C booths was not in service.
 - c. All rolling 3-hour periods (i.e., 06:00 - 09:00, 07:00 - 10:00, etc.) during which the average combustion temperature in the Thermal Oxidizer controlling the B/C+C/C booths, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature in the operation restriction above.

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- d. Any time periods when the emissions unit was in operation and any operational parameter (electrical interlock system signal) indicates inadequate operation (failure) of one of the scenarios documented above, and the paint applicators associated with these booths were not shutdown, indicating that VOC emissions from the B/C and/or C/C booths may not have all been vented to the Thermal Oxidizer.
6. The permittee shall collect and record the following information each month for the coating line B/C+C/C booths:
- a. The name and/or identification number of each type of coating and each individual cleanup material, as applied.
 - b. Whether or not each cleanup material employed is a photochemically reactive material.
 - c. The VOC content of each type of coating (excluding water and exempt solvents) and each individual cleanup material, as applied, in pounds per gallon. Documentation from the paint manufacturer/supplier that all paints within a specific type are guaranteed to be at or below the VOC content limit of 3.5 pounds per gallon shall be sufficient to comply with this requirement for those paints.
 - d. The volume of each type of coating and each individual cleanup material employed, in gallons.
 - e. The total VOC usage of all coatings and cleanup materials employed, in pounds or tons (i.e., summation of c × d).
 - f. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons (i.e., e × percentage of VOC employed in the B/C+C/C booths that is vented to the control system from the B/C+C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
 - g. The total controlled VOC emissions from all coatings and cleanup materials employed, in pounds or tons (i.e., f × [1 - overall control efficiency established during the most recent emission test that demonstrated that the emissions unit was in compliance, or a value of 97% until the initial compliance demonstration is performed]).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly controlled VOC emission rate for all coatings and cleanup

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materials employed, in pounds or tons (i.e., g ÷ h).

- j. The rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials employed in emissions unit K026, in tons.

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 Venturi Waterwash and Dry Filters controlling the B/C+C/C booths were not in service.
 - b. All periods of time when the pressure drop across the Venturi Waterwash controlling the B/C+C/C booths was outside of the allowable range specified above.
 - c. All periods of time when the pressure drop across the Dry Filters controlling the B/C+C/C booths was outside of the allowable range specified above.
 - d. All periods of time when the emissions unit was in operation and the Thermal Oxidizer controlling the B/C+C/C booths was not in service.
 - e. All rolling 3-hour periods (i.e., 06:00 - 09:00, 07:00 - 10:00, etc.) 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.
 - f. All periods of time during which photochemically reactive cleanup materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of material(s) emitted during each such time period, in pounds.
 - g. All periods of time when the emissions unit was in operation and any operational parameter (electrical interlock system signal) indicates inadequate operation (failure) of one of the scenarios documented above, and the paint applicators associated with these booths were not shutdown, indicating that VOC emissions from the B/C and/or C/C booths may not have all been vented to the Thermal Oxidizer.
 - h. Any monthly record showing that the average hourly VOC emission rate from all

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coatings and cleanup materials employed in this emissions unit exceeded the applicable emission limitation.

- i. Any exceedances of the rolling, 12-month emission limitation for the VOC emissions from all coatings and cleanup materials employed in emissions unit K026.

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 Sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The VOC control (destruction) efficiency of the Thermal Oxidizer controlling the B/C+C/C booths shall be equal to or greater than 97%, by weight, while the emissions unit is in operation.

Applicable Compliance Method:

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

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- b. Emission Limitation:VOC emissions shall not exceed 1.66 lbs/hr and 7.27 tons/yr of VOC , based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents.Applicable Compliance Method:

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

The permittee shall also demonstrate compliance with this emission limitation through the emission testing requirements contained in section A.V.2. Compliance with the rolling tons per year VOC emission limitation shall be demonstrated through the record keeping requirements contained in section A.III.

- c. Emission Limitation:

0.551 lb/hr of PEApplicable Compliance Method:

See section A.I.2.e and A.II.1.If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from Ohio EPA.

- d. Emission Limitations:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by ruleApplicable Compliance Method:If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

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e. Emission Limitation:

The capture and control equipment must provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line.

Applicable Compliance Method

The permittee shall demonstrate compliance with this removal efficiency limitation through the emission testing requirements contained in section A.V.2 and by dividing the stack test derived controlled VOC emissions by the stack test derived uncontrolled VOC emissions. The uncontrolled emissions shall be determined by summarizing the inlet VOC emissions to the control equipment for K026 and/or K028 and the VOC emissions for P002.

2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after reaching full production, but not later than 180 days after initial startup following installation of the emissions units, unless otherwise approved by the Ohio EPA, Southeast District Office (SEDO) or Central Office (CO).
 - b. The emission testing shall be conducted on units K026 and/or K028, in addition to P002 to demonstrate compliance with the hourly VOC emission limitation, VOC control (destruction) efficiency of the Thermal Oxidizer, the reduction in the overall VOC emissions from the coating line including P002, and to confirm total capture of the VOC emissions from the B/C+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 (destruction) 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;
 - ii. for VOC capture, the permittee shall demonstrate initial compliance by showing that there is constant inflow of air throughout the openings into

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the B/C+C/C booths, using a velocity meter, streamers, smoke tubes, tracer gases, or other means with prior approval from the Ohio EPA;

- iii. for the reduction in the overall VOC emissions from the coating line including P002, the permittee shall stack test K026 and/or K028, in addition to P002 in sequence without a significant delay in testing*; and
- iv. alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA, SEDO or CO.

* the permittee, with Ohio EPA approval, may stack test K026 and/or K028, in addition to P002 out of sequence or with a significant lapse in time if the permittee can demonstrate that no significant changes in the coating operation occurred between mass emission tests. This demonstration should be performed using parameters such as coating VOC concentration, transfer efficiency, cab design, etc.

- d. The permittee may conduct the emissions tests while emissions units K026, K028 and P002 are in operation at their maximum capacities. Under this test scenario, compliance with the hourly VOC emissions limitations for emissions units K026 and K028 shall be demonstrated if the tested hourly VOC emission rate is equal to or less than the summation of the hourly VOC emission limitations for emissions units K026 and K028. P002 will be tested separately. For the purpose of efficient operation, during normal operations, exhaust air from emissions unit K027 (S/P booth) is used as inlet air to emissions units K026, K028, and P002 (robot B/C+C/C booths and drying oven). As such, the VOC emissions from K027 are also carried into K026, K028, and P002. Additionally, wipe solvent is normally used in K026 and K028, but is regulated/tracked on a facility-wide basis. However, the VOC emissions limits in this PTI for K026, K028, and P002 do not account for K027's carry-over VOC emissions or for use of wipe solvent. Therefore, emission testing for K026, K028, and P002 shall be conducted while K027 is not operating and without use of wipe solvent in the emissions units or with Ohio EPA approval mass balancing may be used to account for the portion of the stack test emissions that occur due to wipe solvent usage and/or K027.
- e. All monitoring systems and equipment shall be installed, operational, and calibrated prior to the emission tests.
- f. During the emissions tests, the permittee shall monitor and record the average combustion temperature within the Thermal Oxidizer at least every 15 minutes. The arithmetic average for the average combustion temperature shall be calculated using all of the recorded measurements collected during the compliance demonstration.

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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 receipt by Kenworth of the final testing report. 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

1. The terms and conditions in this permit to install shall supersede the terms and conditions for emissions unit K026 contained in permit to install No. 06-07879, issued 07/25/2006.

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.

Operations, Property, and/or Equipment - K026 - Robotic Cab Paint Booths Line No. 1

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01	See B.III.1 through B.III.3
ORC 3704.03(F)	See B.III.1 through B.III.3

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the Permit to Install application, and modeling was performed for the toxic pollutant(s) emitted at over 1 ton per year using the SCREEN 3.0 model or other Ohio EPA-approved model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (or other approved model) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst-case" pollutant(s):
 Pollutant: Aluminum compounds
 TLV (mg/m³): 10.00
 Maximum Hourly Emission Rate (lbs/hr): 1.243
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5.764
 MAGLC (ug/m³): 238.1
2. Physical changes to or changes in the method of operation of the emissions unit after

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its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the TLV previously modeled, as documented in the most recent version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing Permit to Install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final Permit to Install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions

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unit still satisfies the "Air Toxic Policy;" and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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 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 - K027 - Manual Spot Prime Booth Lines #1 & #2 – Manual Spot Prime (S/P) Coating Booth controlled by Paint Arrestor, servicing K026 and K028.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The requirements of this rule includes compliance with the requirements of OAC rule 3745-31-10 thru 20 and OAC rule 3745-21-09(U)(1)(c).
OAC rule 3745-10 thru 20	3.36 lbs/hr and 14.72 tons/yr of VOC based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents. 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for each coating employed in the Spot Prime (S/P) booth.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a.
OAC rule 3745-21-09(U)(1)(c)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 through 20.
OAC rule 3745-21-07(G)(2)	See A.I.2.b
OAC rule 3745-17-11(B)(1)	0.551 lb/hr of PE (See A.I.2.c)
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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- 2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, and PM10 emissions from this air contaminant source since the calculated annual uncontrolled emission rate for each of these pollutants is less than 10 tons/yr.
- 2.b** 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.c** The hourly PE limitation is greater than the emission unit's uncontrolled potential to emit. Therefore, no records are required to demonstrate compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for the coating line S/P booth:
 - a. The name and identification number of each type of coating and each individual cleanup material, as applied.
 - b. Whether or not each cleanup material employed is a photochemically reactive material.
 - c. The VOC content of each type of coating (excluding water and exempt solvents) and each individual cleanup material, as applied, in pounds per gallon. Documentation from the paint manufacturer/supplier that all paints within a specific type are guaranteed to be at or below the VOC content limit of 3.5 pounds per gallon shall be sufficient to comply with this requirement for those paints.
 - d. The volume of each type of coating and each individual cleanup material

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employed, in gallons.

- e. The total VOC usage (emissions) of all coatings and cleanup materials employed, in pounds or tons (i.e., summation of $c \times d$).
- f. The total number of hours the emissions unit was in operation.
- g. The average hourly controlled VOC emission rate for all coatings and cleanup materials employed, in pounds or tons (i.e., $e \div f$).
- h. The rolling, 12-month summation of the combined VOC emissions from all coatings and cleanup materials employed in 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 during which photochemically reactive cleanup materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of material(s) emitted during each such time period, in pounds.
 - b. Any monthly record showing that the average hourly VOC emission rate from all coatings and cleanup materials employed in this emissions unit exceeded the applicable emission limitation.
 - c. Any exceedances of the rolling, 12-month emission limitation for the combined VOC emissions from all coatings and cleanup materials employed in this emissions unit.

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

2. The permittee shall notify the Director (Ohio EPA, Southeast District Office) showing the use of coatings with a VOC content greater than 3.5 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or

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local air agency) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations in Sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

3.36 lbs/hr and 14.72 tons/yr of VOC based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents.

Applicable Compliance Method:The permittee shall demonstrate compliance with the hourly and rolling tons per year emissions limitations through the recordkeeping requirements contained in section A.III.
 - b. Emission Limitation:3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for each coating employed in the S/P booth.

Applicable Compliance Method:The permittee shall demonstrate compliance with this emission limitation through the recordkeeping requirements contained 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.
 - c. Emission Limitation:0.551 lb/hr of PEApplicable Compliance Method:

See section A.I.2.c.If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from Ohio EPA.
 - d. Emission Limitation:Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.Applicable Compliance Method:If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

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.

Operations, Property, and/or Equipment - K027 - Manual Spot Prime Booth servicing Robotic Cab Paint Booths Lines No. 1 and No. 2.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

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Emissions Unit ID: K027

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 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 - K028 - Robotic Cab Paint Booths Line No. 2 - Robotic Base Coat (B/C) and Clear Coat (C/C) Paint Booths controlled by Venturi Waterwash, Dry Filters, and Thermal Oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rules 3745-31-05(A)(3)	The requirements of this rule includes compliance with the requirements of OAC rule 3745-31-10 thru 20 and OAC rule 3745-21-09(B)(6).
OAC rule 3745-31-10 thru 20	<p>When 4 robots are operating in both the Base Coat (B/C) and Clear Coat (C/C) booths, VOC emissions shall not exceed 3.32 lbs/hr and 14.54 tons/yr of VOC, based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents.</p> <p>When 2 robots are operating in both the B/C and C/C booths, VOC emissions shall not exceed 1.66 lbs/hr and 7.27 tons/yr of VOC, based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents.</p> <p>See A.I.2.e, A.I.2.f and A.I.2.g.</p>
OAC rule 3745-21-07(G)(2)	See A.I.2.c
OAC rule 3745-17-11(B)(1)	0.863 lb/hr of PE (See A.I.2.d and A.II.1.)
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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OAC rule 3745-21-09(B)(6)	The destruction efficiency requirement contained in this rule is less stringent than the destruction efficiency established pursuant to OAC rule 3745-31-10 thru 20. The capture and control equipment must provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line. See A.I.2.b.
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, PM10, SO₂, NO_x, or CO emissions from this air contaminant source since the calculated annual uncontrolled emission rate for each of these pollutants is less than 10 ton/yr.
- 2.b** The permittee has chosen to comply with this rule in lieu of OAC rule 3745-21-09(U)(1)(c) for this coating line.
- 2.c** The permittee shall not employ any photochemically reactive cleanup 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 PE emission limitation is greater than the emissions unit's controlled potential to emit. Therefore, no records other than those required to document proper operation of the control devices are required to demonstrate compliance with this limit.
- 2.e** For purposes of calculating the VOC emission rates for this emissions unit and the associated oven (emissions unit P002), the permittee shall utilize a value of 96% as the percentage of the VOCs employed from coatings only in this emissions unit that are vented to the Thermal Oxidizer. The remaining 4% of the VOCs employed from coatings only in this emissions unit shall be considered to be uncontrolled emissions for the associated oven, due to paint continuing to dry from the coatings applied in the B/C+C/C booths. All VOC emissions from cleanup solvents are vented to the Thermal Oxidizer in this emissions unit. 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

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revised based upon the data collected during the initial compliance demonstration.

- 2.f** The VOC control (destruction) efficiency of the Thermal Oxidizer controlling the B/C+C/C booths shall be equal to or greater than 97%, by weight, while the emissions unit is in operation.
- 2.g** Kenworth intends to construct emissions unit K028 with initially only two robots per booth (two robots in B/C booth and two robots in C/C booth), which is the same configuration as emissions unit K026. However, it is anticipated that within 30 months Kenworth intends to install two additional robots in each booth in emissions unit K028 for a total of four robots per booth, increasing its productivity and potential emissions by a factor of two (K026 will remain two robots per booth). Kenworth shall implement a plan of continuous construction for this emissions unit. Any cessation of work for over eighteen months will require a PTI extension for another twelve months in order to continue construction. If the construction is ceased for this unit such that the permit conditions are allowed to expire after the first two robots are installed but before the second two robots are installed, a new permit to install is needed to be obtained for the second two robots.

II. Operational Restrictions

1. The permittee shall operate the Venturi Waterwash and Dry Filters for control of PE emissions from the B/C+C/C booths at all times this emissions unit is in operation.
2. The permittee shall operate the Thermal Oxidizer for control of VOC emissions from the B/C+C/C booths at all times this emissions unit is in operation.
3. The average combustion temperature in the Thermal Oxidizer controlling the B/C+C/C booths, for any 3-hour periods 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.
4. All of the VOC emissions generated in the B/C+C/C booths shall be captured and vented to the Thermal Oxidizer (except the split of VOC emitted at the drying ovens due to paint continuing to dry from the coatings applied in the B/C+C/C booths, as

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discussed above, or cleaning of paint application equipment immediately following an unplanned shutdown of the paint application equipment caused by the "electrical interlock system" discussed below).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the dry filters during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the dry filters on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the dry filters shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the

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monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the venturi waterwash during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the the pressure drop, in inches of water, across the venturi waterwash on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the venturi waterwash shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

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3. The permittee shall install, operate, and maintain equipment to continuously monitor the combustion temperature within the Thermal Oxidizer serving the B/C+C/C booths when either booth is in operation. Units shall be measured in degrees Fahrenheit. 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 modification deemed necessary by the permittee.
4. In order to ensure that all VOC emissions are vented from the B/C+C/C booths to the Thermal Oxidizer, the permittee will utilize an electrical interlock system which will continuously monitor the following parameters for indication of inadequate operation (failure) of the VOC capture system when the booths are in operation:
 - a. Spot Prime Exhaust Fan (B/C+C/C inlet air):if pressure differential switch fails to close, or to remain closed, when fan reaches operating speed
 - b. B/C+C/C Booth Exhaust Fans / Abatement Feed Fans:if pressure differential switch fails to close, or to remain closed, when fan reaches operating speed
 - c. B/C+C/C Booth Recirculation Fans:if fan speed varies by more than ± 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)
 - d. B/C+C/C System Exhaust Dry Filter Media:if pressure differential deviates from set point either below 0.1" WC or above 1.5" WC
 - e. B/C+C/C Sludge Water Interlock:if pressure differential switch or pump motor running contact fail to close, or to remain closed, during operation

If any of the above scenarios occur, the permissive to the appropriate robotic B/Cand/or C/C application equipment will be removed so that the paint application will be automatically shutdown until after the affected operational parameter (and associated electrical interlock system signal) is restored to the appropriate level.

The permittee shall install, operate, and maintain equipment to continuously monitor and record the electrical input to the affected operation(s) described above associated with the B/C+C/C booths. The monitoring and recording equipment shall be capable of accurately measuring the desired parameters. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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* Since "±8 Hz from the electric input set points " was based upon an educated estimate by the facility's engineering contractor, a more appropriate setpoint 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 setpoint and/or variation range shall be utilized.

5. The permittee shall collect and record the following information for each day for the coating line and control equipment:
 - a. Any time periods when the emissions unit was in operation and the Venturi Waterwash and Dry Filters serving the B/C+C/C booths were not in service.
 - b. Any time periods when the emissions unit was in operation and the Thermal Oxidizer serving the B/C+C/C booths was not in service.
 - c. All rolling 3-hour periods (i.e., 06:00 - 09:00, 07:00 - 10:00, etc.) during which the average combustion temperature in the Thermal Oxidizer controlling the B/C+C/C booths, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature in the operation restriction above.
 - d. Any time periods when the emissions unit was in operation and any operational parameter (electrical interlock system signal) indicates inadequate operation (failure) of one of the scenarios documented above, and the paint applicators associated with these booths were not shutdown, indicating that VOC emissions from the B/C+C/C booths may not have all been vented to the Thermal Oxidizer.

6. The permittee shall collect and record the following information each month for the coating line B/C+C/C booths:
 - a. The name and/or identification number of each type of coating and each individual cleanup material, as applied.
 - b. Whether or not each cleanup material employed is a photochemically reactive material.
 - c. The VOC content of each type of coating (excluding water and exempt solvents) and each individual cleanup material, as applied, in pounds per gallon. Documentation from the paint manufacturer/supplier that all paints within a specific type are guaranteed to be at or below the VOC content limit of 3.5 pounds per gallon shall be sufficient to comply with this requirement for those paints.

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- d. The volume of each type of coating and each individual cleanup material employed, in gallons.
- e. The total VOC usage of all coatings and cleanup materials employed, in pounds or tons (i.e., summation of c × d).
- f. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons (i.e., e × percentage of VOC employed in the B/C+C/C booths that is vented to the control system from the B/C+C/C booths - a value of 96% shall be used until the initial compliance demonstration for this coating line is performed).
- g. The total controlled VOC emissions from all coatings and cleanup materials employed, in pounds or tons (i.e., f × [1 - overall control efficiency established during the most recent emission test that demonstrated that the emissions unit was in compliance, or a value of 97% until the initial compliance demonstration is performed])).
- h. The total number of hours the emissions unit was in operation.
- i. The average hourly controlled VOC emission rate for all coatings and cleanup materials employed, in pounds or tons (i.e., g ÷ h).
- j. The rolling, 12-month summation of the combined VOC emissions from all coatings and cleanup materials employed in emissions unit K028, in tons.

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 Venturi Waterwash and Dry Filters controlling the B/C+C/C booths were not in service.
 - b. All periods of time when the pressure drop across the Venturi Waterwash controlling the B/C+C/C booths was outside of the allowable range specified above.
 - c. All periods of time when the pressure drop across the Dry Filters controlling the B/C+C/C booths was outside of the allowable range specified above.
 - d. All periods of time when the emissions unit was in operation and the Thermal Oxidizer controlling the B/C+C/C booths was not in service.
 - e. All rolling 3-hour periods (i.e., 06:00 - 09:00, 07:00 - 10:00, etc.) 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.
 - f. All periods of time during which photochemically reactive cleanup materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s), and the estimated total quantity of material(s) emitted during each such time period, in pounds.
 - g. All periods of time when the emissions unit was in operation and any operational parameter (electrical interlock system signal) indicates inadequate operation (failure) of one of the scenarios documented above, and the paint applicators associated with these booths were not shutdown, indicating that VOC emissions from the B/Cand/or C/C booths may not have all been vented to the Thermal Oxidizer.
 - h. Any monthly record showing that the average hourly VOC emission rate from all coatings and cleanup materials employed in this emissions unit exceeded the applicable emission limitation.
 - i. Any exceedances of the rolling, 12-month emission limitation for the VOC emissions from all coatings and cleanup materials employed in emissions unit K028.

The quarterly deviation reports shall be submitted in accordance with General

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V. Testing Requirements

1. Compliance with the emission limitations in Sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The VOC control (destruction) efficiency of the Thermal Oxidizer controlling the B/C+C/C booths shall be equal to or greater than 97%, by weight, while the emissions unit is in operation.

Applicable Compliance Method:

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

- b. Emission Limitation: When 2 robots are operating in both the B/C and C/C booths, VOC emissions shall not exceed 1.66 lbs/hr and 7.27 tons/yr, based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents.Applicable Compliance Method:

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

Compliance with the rolling tons per year VOC emission limitation shall be demonstrated through the record keeping requirements contained in section A.III.

- c. Emission Limitation: When 4 robots are operating in both the B/C and C/C booths, VOC emissions shall not exceed 3.32 lbs/hr and 14.54 tons/yr, based upon a rolling, 12-month summation, including emissions from coatings and cleanup solvents.Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation through the recordkeeping requirements contained in section A.III. The permittee shall also demonstrate compliance with this emission limitation through the emission testing requirements contained in section A.V.2.

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Compliance with the rolling tons per year VOC emission limitation shall be demonstrated through the recordkeeping requirements contained in section A.III.

d. Emission Limitation:

0.863 lb/hr of PE Applicable Compliance Method:

See section A.I.2.d and A.II.1 .If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from Ohio EPA.

e. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

f. Emission Limitation:

The capture and control equipment must provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line.

Applicable Compliance Method

The permittee shall demonstrate compliance with this removal efficiency limitation through the emission testing requirements contained in section A.V.2 and by dividing the stack test derived controlled VOC emissions by the stack test derived uncontrolled VOC emissions. The uncontrolled emissions shall be determined by summarizing the inlet VOC emissions to the control equipment for K026 and/or K028 and the VOC emissions for P002.

2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after reaching full production, but not later than 180 days after initial startup following installation of the emissions units, unless otherwise approved by the Ohio EPA, Southeast District Office (SEDO) or Central Office (CO).

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- b. The emission testing shall be conducted on units K026 and/or K028, in addition to P002 to demonstrate compliance with the hourly VOC emission limitation, VOC control (destruction) efficiency of the Thermal Oxidizer, the reduction in overall VOC emissions from the coating line including P002, and to confirm total capture of the VOC emissions from the B/C+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 (destruction) 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+C/C booths, using a velocity meter, streamers, smoke tubes, tracer gases, or other means with prior approval from the Ohio EPA.
 - iii. for the reduction in the overall VOC emissions from the coating line including P002, the permittee shall stack test K026 and/or K028, in addition to P002 in sequence without a significant delay in testing*; and
 - iv. alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA, SEDO or CO.

* the permittee, with Ohio EPA approval, may stack test K026 and/or K028, in addition to P002 out of sequence or with a significant lapse in time if the permittee can demonstrate that no significant changes in the coating operation occurred between mass emission tests. This demonstration should be performed using parameters such as coating VOC concentration, transfer efficiency, cab design, etc.

- d. The permittee may conduct the emissions tests while emissions units K026, K028 and P002 are in operation at their maximum capacities. Under this test scenario, compliance with the hourly VOC emissions limitations for emissions units K026 and K028 shall be demonstrated if the tested hourly VOC emission

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rate is equal to or less than the summation of the hourly VOC emission limitations for emissions units K026 and K028. P002 will be tested separately. For the purpose of efficient operation, during normal operations, exhaust air from emissions unit K027 (S/P booth) is used as inlet air to emissions units K026, K028, and P002 (robot B/C+C/C booths and drying oven). As such, the VOC emissions from K027 are also carried into K026, K028, and P002. Additionally, wipe solvent is normally used in K026 and K028, but is regulated/tracked on a facility-wide basis. However, the VOC emissions limits in this PTI for K026, K028, and P002 do not account for K027's carry-over VOC emissions or for use of wipe solvent. Therefore, emission testing for K026, K028, and P002 shall be conducted while K027 is not operating and without use of wipe solvent in the emissions units or with Ohio EPA approval mass balancing may be used to account for the portion of the stack test emissions that occur due to wipe solvent usage and/or K027.

- e. All monitoring systems and equipment shall be installed, operational, and calibrated prior to the emission tests.
- f. During the emission tests, the permittee shall monitor and record the average combustion temperature within the Thermal Oxidizer at least every 15 minutes. 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 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 receipt by Kenworth of the final testing report. 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.

Operations, Property, and/or Equipment - K028 - Robotic Cab Paint Booths Line No. 2

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01	See B.III.1 through B.III.3.
ORC 3704.03(F)	See B.III.1 through B.III.3.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the Permit to Install application, and modeling was performed for the toxic pollutant(s) emitted at over 1 ton per year

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using the SCREEN 3.0 model or other Ohio EPA-approved model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (or other approved model) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst-case" pollutant(s): Pollutant: Aluminum compounds TLV (mg/m³): 10.00 Maximum Hourly Emission Rate (lbs/hr): 1.243 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5.764 MAGLC (ug/m³): 238.1

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the TLV previously modeled, as documented in the most recent version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing Permit to Install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final Permit to Install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit

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will still satisfy the "Air Toxic Policy:"

- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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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 Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - P002 - Cab Drying Ovens and Flash Tunnels services Robotic Cab Booths Lines No. 1 and No. 2 with a total heat input capacity of 4.58 mmBtu/hr.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rules 3745-31-05(A)(3)	The requirements of this rule includes compliance with the requirements of OAC rule 3745-31-10 thru 20, OAC rule 3745-21-09(B)(6), .
OAC rule 3745-31-10 thru 20	VOC emissions from this emissions unit shall not exceed: 9.63 lbs/hr when operating emissions units K026 & K028; 3.21 lbs/hr when operating emissions unit K026 only; 6.42 lbs/hr when operating emissions unit K028 only; and 42.18 tons/yr of VOC based upon a rolling, 12-month summation. See A.I.2 c.
OAC rule 3745-21-07(G)(1)	See A.I.2.d
OAC rule 3745-17-11(B)(1)	0.551 lb/hr of PE (See A.I.2.b)
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-21-09(B)(6)	The capture and control equipment must provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line.
OAC rules 3745-31-05(A)(3)(b)	See A.I.2.a.

2. Additional Terms and Conditions

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- 2.a** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, PM₁₀, SO₂, NO_x, or CO emissions from this air contaminant source since the calculated annual uncontrolled emission rate for each of these pollutants is less than 10 ton/yr.
- 2.b** The hourly PE emission limitation is greater than the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limit.
- 2.c** For purposes of calculating the VOC emission rates for this emissions unit and the associated spray booths (emissions units K026 and K028), the permittee shall utilize a value of 96% as the percentage of the VOCs employed from coatings only in the spray booths that are vented to the Thermal Oxidizer (which controls VOC emissions from the B/C+C/C booths of emissions units K026 and K028). The remaining 4% of the VOCs employed from coatings only in the spray booths shall be considered to be uncontrolled emissions for this emissions unit, due to paint continuing to dry from the coatings applied in the B/C+C/C booths. All VOC emissions from cleanup solvents in the B/C+C/C booths are vented to the Thermal Oxidizer. This "split" of VOC emissions between this emissions unit and the associated spray booths is based upon engineering evaluations provided by the permittee and may be revised based upon the data collected during the initial compliance demonstration.
- 2.d** 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)(1).

II. Operational Restrictions

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

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.

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2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions unit K026, in pounds or tons.
 - b. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions unit K028, in pounds or tons.
 - c. The uncontrolled VOC emissions from all coatings employed in the B/C and C/C booths of emissions units K026 and K028, combined, in pounds or tons.
 - d. The total uncontrolled VOC emissions for this emissions unit, in pounds or tons (i.e., $c \times$ percentage of VOC employed in the K026 and K028 B/C+C/C booths that is emitted in this emissions unit - a value of 4% shall be used until the initial compliance demonstration for this coating line is performed).
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly controlled VOC emission rate, in pounds or tons (i.e., $d \div e$).
 - g. The rolling, 12-month summation of the combined VOC emissions from all coatings and cleanup materials employed in emissions unit P002, 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. Any monthly record showing that the average hourly VOC emission rate from this emissions unit exceeded the applicable emission limitation.
 - c. Any exceedances of the rolling, 12-month emission limitation for the VOC emissions from all coatings and cleanup materials employed in emissions unit

Emissions Unit ID: P002

P002.

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 Sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:9.63 lbs/hr of VOC when operating emissions units K026 and K028;3.21 lbs/hr of VOC when operating emissions unit K026 only; and6.42 lbs/hr of VOC when operating emissions unit K028 only.Applicable Compliance Method:The permittee shall demonstrate compliance with these emission limitations through the recordkeeping requirements contained in section A.III.The permittee shall also demonstrate compliance with these emission limitation(s) through the emission testing requirements contained in section A.V.2.
 - b. Emission Limitation:42.18 tons/yr of VOC based upon a rolling, 12-month summation.

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

- c. Emission Limitation:0.551 lb/hr of PEApplicable Compliance Method:

See section A.I.2.b.If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 5 of 40 CFR Part 60, Appendix A, or other USEPA approved test method, with prior approval from Ohio EPA.

- d. Emission Limitation:Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by ruleApplicable Compliance Method:If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- e. Emission Limitation:

The capture and control equipment must provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line.

Applicable Compliance Method

The permittee shall demonstrate compliance with this removal efficiency limitation through the emission testing requirements contained in section A.V.2 and by dividing the stack test derived controlled VOC emissions by the stack test derived uncontrolled VOC emissions. The uncontrolled emissions shall be determined by summarizing the inlet VOC emissions to the control equipment for K026 and/or K028, and the VOC emissions for P002.

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2. Emission Testing Requirements: The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within 90 days after reaching full production, but not later than 180 days after initial startup following installation of the emissions units, unless otherwise approved by the Ohio EPA, Southeast District Office (SEDO) or Central Office (CO).
 - b. The emission testing shall be conducted on units K026 and/or K028, in addition to P002 to demonstrate compliance with the hourly VOC emission limitation(s) and the overall reduction of VOC for the coating line including K026 and/or K028.
 - c. The following test methods shall be employed to demonstrate compliance with the emission limitations:
 - i. for the hourly VOC emission limitation, 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.
 - ii. for the reduction in the overall VOC emissions from the coating line including K026 and/or K028, the permittee shall stack test K026 and/or K028, in addition to P002 in sequence without a significant delay in testing*; and
 - iii. alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA, SEDO or CO.
- * the permittee, with Ohio EPA approval, may stack test K026 and/or K028, in addition to P002 out of sequence or with a significant lapse in time if the permittee can demonstrate that no significant changes in the coating operation occurred between mass emission tests. These demonstration should be performed using parameters such as coating VOC concentration, transfer efficiency, cab design, etc.
- d. The tests shall be conducted while emissions units K026 and/or K028 are operating at or near the units maximum capacity, unless otherwise specified or approved by the Ohio EPA, SEDO or CO. Kenworth intends to construct

Emissions Unit ID: P002

emissions unit K028 with initially only two robots per booth (two robots in B/C booth and two robots in C/C booth), which is the same configuration as emissions unit K026. However, it is anticipated that within 30 months Kenworth intends to install two additional robots in each booth in emissions unit K028 for a total of four robots per booth, increasing its productivity and potential emissions by a factor of two (K026 will remain two robots per booth). The limits in this PTI are for K028 at the higher emission rate with four robots per booth. Therefore, if stack testing is performed during operation of K028, it shall be performed at or near the maximum capacity of the emissions unit, which is based on how K028 has been constructed at the time of the testing. For the purpose of efficient operation, during normal operations, exhaust air from emissions unit K027 (S/P booth) is used as inlet air to emissions units K026, K028, and P002 (robot B/C+C/C booths and drying oven). As such, the VOC emissions from K027 are also carried into K026, K028, and P002. However, the VOC emissions limits in this PTI for K026, K028, and P002 do not account for K027's carry-over VOC emissions. Therefore, emission testing for K026, K028, and P002 shall be conducted while K027 is not operating or with Ohio EPA approval mass balancing may be used to account for the portion of the stack test emissions that occur due to K027.

- e. All monitoring systems and equipment shall be installed, operational, and calibrated prior to the emission tests.

3. 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 receipt by Kenworth of the final testing report. 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

Emissions Unit ID: P002

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.

Operations, Property, and/or Equipment - P002 - Cab Drying Ovens and Flash Tunnels services Robotic Cab Booths Lines No. 1 and No. 2.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01	See B.III.1. through B.III.3.
ORC 3704.03(F)	See B.III.1. through B.III.3.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The Permit to Install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the Permit to Install application, and modeling was performed for the toxic pollutant(s) emitted at over 1 ton per year using the SCREEN 3.0 model or other Ohio EPA-approved model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model (or other approved model) was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst-case" pollutant(s):
Pollutant: Aluminum compounds
TLV (mg/m³): 10.00
Maximum Hourly Emission Rate (lbs/hr): 1.243
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5.764
MAGLC (ug/m³): 238.1
2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or

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not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the TLV previously modeled, as documented in the most recent version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing Permit to Install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final Permit to Install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy;" and

Emissions Unit ID: P002

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 06-08317 Facility ID: 0671010121

FACILITY NAME Kenworth Truck Co.

FACILITY DESCRIPTION To install one new spot prime booth one new robotic paint line two new drying ovens and supporting operations including six PTI exempt air heaters. CITY/TWP Chillicothe

SIC CODE 3711 SCC CODE _____ EMISSIONS UNIT ID K026

EMISSIONS UNIT DESCRIPTION Robotic Cab Paint Booths Line No. 1

DATE INSTALLED _____

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? **Y** _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 06-08317 Facility ID: 0671010121

FACILITY NAME Kenworth Truck Co.

FACILITY DESCRIPTION To install one new spot prime booth CITY/TWP Chillicothe

Emissions Unit ID: P002

heaters.

SIC CODE 3711 SCC CODE EMISSIONS UNIT ID K027

EMISSIONS UNIT DESCRIPTION Manual Spot Prime Booth servicing Robotic Cab Paint Booths Lines No. 1 and No. 2.

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? Y OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 06-08317 Facility ID: 0671010121

FACILITY NAME Kenworth Truck Co.

FACILITY DESCRIPTION To install one new spot prime booth CITY/TWP Chillicothe

Emissions Unit ID: P002

heaters.

SIC CODE 3711 SCC CODE EMISSIONS UNIT ID K028

EMISSIONS UNIT DESCRIPTION Robotic Cab Paint Booths Line No. 2

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? Y OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 06-08317 Facility ID: 0671010121

FACILITY NAME Kenworth Truck Co.

FACILITY DESCRIPTION To install one new spot prime booth CITY/TWP Chillicothe

Emissions Unit ID: P002

heaters.

SIC CODE 3711 SCC CODE EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION Cab Drying Ovens and Flash Tunnels services Robotic Cab Booths Lines No. 1 and No. 2.

DATE INSTALLED

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? Y OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS: