



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

2/15/2013

Certified Mail

Mr. Brad Crichton  
KUKA Toledo Production Operations  
3770 Stickney Avenue  
Toledo, OH 43608-1310

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0448011730  
Permit Number: P0110907  
Permit Type: Administrative Modification  
County: Lucas

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/pemitsurvey.aspx](http://www.epa.ohio.gov/dapc/pemitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
TDES; Michigan; Indiana; Canada



**FINAL**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
KUKA Toledo Production Operations

Facility ID:	0448011730
Permit Number:	P0110907
Permit Type:	Administrative Modification
Issued:	2/15/2013
Effective:	2/15/2013





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
KUKA Toledo Production Operations

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## Authorization

Facility ID: 0448011730  
Facility Description: Body Shop portion of Automotive and Light Duty Truck Supplier Park  
Application Number(s): M0001885  
Permit Number: P0110907  
Permit Description: Administrative modification to replace existing vehicle production based restrictions with alternate equivalent restrictions  
Permit Type: Administrative Modification  
Permit Fee: \$300.00  
Issue Date: 2/15/2013  
Effective Date: 2/15/2013

This document constitutes issuance to:

KUKA Toledo Production Operations  
3770 Stickney Avenue  
Toledo, OH 43608-1310

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

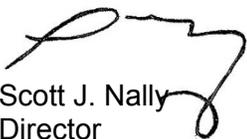
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110907

Permit Description: Administrative modification to replace existing vehicle production based restrictions with alternate equivalent restrictions

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

<b>Emissions Unit ID:</b>	<b>P201</b>
Company Equipment ID:	KTPO_ADH
Superseded Permit Number:	04-01357
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P202</b>
Company Equipment ID:	KTPO_Weld
Superseded Permit Number:	04-01357
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P203</b>
Company Equipment ID:	KTPO_BIW
Superseded Permit Number:	04-01357
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
KUKA Toledo Production Operations  
**Permit Number:** P0110907  
**Facility ID:** 0448011730  
**Effective Date:** 2/15/2013

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

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

## **2. Severability Clause**

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

## **3. General Requirements**

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



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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

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



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

## **5. Scheduled Maintenance/Malfunction Reporting**

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

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

## **6. Compliance Requirements**

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



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

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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



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

## **10. Applicability**

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

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

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



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

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

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

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

## **12. Permit-To-Operate Application**

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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



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

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

**16. Fees**

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

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
KUKA Toledo Production Operations  
**Permit Number:** P0110907  
**Facility ID:** 0448011730  
**Effective Date:** 2/15/2013

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 2 of Subpart IIII.

The following emissions units in this permit are subject to the aforementioned requirements: P201.

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: P201. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.



**Final Permit-to-Install**  
KUKA Toledo Production Operations  
**Permit Number:** P0110907  
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**Effective Date:** 2/15/2013

## **C. Emissions Unit Terms and Conditions**



**1. P201, KTPO\_ADH**

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

Miscellaneous sealer and adhesive application using low volatile organic compound (VOC) materials with no control

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-01357, issued 8/31/2004)	the emissions of volatile organic compounds (VOC) from all sealers and adhesives utilized in this emissions unit shall not exceed 9.9 pounds volatile organic compounds (VOC) per hour  see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-21 thru 27 (PTI 04-01357, issued 8/31/2004)	the emissions of VOC from all sealers and adhesives utilized in this emissions unit shall not exceed 0.3 pound of VOC per gallon, minus water, as a daily volume weighted average, and 12 tons of VOC per rolling, 12-month period  see b)(2)d.
c.	OAC rule 3745-21-09(U)(1)(d)	the emissions of VOC from any material which is applied to metallic surfaces shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents
d.	40 CFR Part 63 Subpart A (63.1 through 63.16)	see b)(2)e.
e.	40 CFR Part 63 Subpart IIII (63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or light-duty	In accordance with 40 CFR 63.3091(c) the average organic hazardous air pollutant (HAP) emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section	kg/kg (lb/lb) of adhesive and sealer material used during each month.  [40 CFR 63.3091(c)]

(2) Additional Terms and Conditions

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

$$12 \text{ tons VOC} \geq \sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$$

Where:

$Q_i$  = usage of sealer and/or adhesive material  $i$ , gallons

$VOC_i$  = volatile organic compound content of material  $i$ , pounds per gallon

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

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee may elect to comply with the emissions limitation for VOC content as a monthly maximum for all coating repair operations, or as a daily volume weighted average of the materials used in this emissions unit. This election shall be made by advance notification to the Director and shall remain in effect on a calendar month basis.



- (2) For purposes of compliance with the emissions limitation for material applied to metallic surfaces (3.5 pounds VOC per gallon, excluding water and exempt solvents) the permittee shall collect and record on a monthly basis the following information:
- a. the name and identification number of each sealer and adhesive applied to metallic surfaces; and
  - b. the VOC content, excluding water and exempt solvents, of each sealer and adhesive applied to metallic surfaces.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) For purposes of compliance with the emissions limitation for sealers and adhesives (0.3 pound of VOC per gallon, excluding water, on a daily basis), the permittee shall collect and record the following information for this emissions unit:
- a. When using complying coatings for all sealers and adhesives, on a monthly basis:
    - i. the name and identification number of each sealer and adhesive, as applied; and
    - ii. the VOC content, excluding water, of each sealer and adhesive, as applied.

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

- b. When calculating a daily volume-weighted average VOC content for the sealers and adhesives, on a monthly basis:
  - i. the name and identification number of each sealer and adhesive, as applied;
  - ii. the VOC content, excluding water and exempt solvents, and the number of gallons, excluding water and exempt solvents, of each sealer and adhesive, as applied; and
  - iii. the volume-weighted average VOC content of all sealer and adhesive, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

- (4) For purposes of compliance with the rolling, 12-month VOC emissions limitation for sealers and adhesives (12 tons), the permittee shall collect and record on a monthly basis the following information for all sealer and adhesive operations:
- a. the company identification for each sealer and adhesive utilized;
  - b. the number of gallons of each sealer and adhesive utilized,  $Q_i$ ;



- c. the volatile organic compound content of each sealer and adhesive utilized, in pounds per gallon,  $VOC_i$ ;
- d. the total VOC emissions from all sealers and adhesives utilized, in tons;  $\sum_{i=1}^n (Q_i)(VOC_i) \div (2000 \text{ pounds/ton})$ , and
- e. the rolling, 12-month total quantity of VOC emissions, in tons.

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

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

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

e) Reporting Requirements

- (1) The permittee shall notify the Director of any monthly record showing the use of a sealer or adhesive in this emissions unit that was applied to metallic surfaces which exceeded 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.
- (2) The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day of the calendar quarter during which the coating line exceeds the applicable VOC content limitation (0.3 pounds per gallon excluding water) for all sealers and adhesives employed and the actual average VOC content for each such day.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing that the VOC emissions from all sealants and adhesives utilized in this emissions unit exceed 12 tons per rolling, 12-month period.
- (4) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (6) See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176).

f) Testing Requirements

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



a. Emission Limitations:

0.3 pound of volatile organic compounds (VOC) per gallon as a daily volume weighted average, minus water

Applicable Compliance Method:

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

c. Emission Limitations:

9.9 pounds VOC per hour

Applicable Compliance Method:

This emissions limitation was established based on a one-time calculation of the worst case operating scenario (82 jobs/hour) and a company supplied emissions factor (0.12 pound VOC/job). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



d. Emission Limitation:

12 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(4). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**2. P202, KTPO\_Weld**

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

Body Shop finish welding operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	emissions from all welding operations located at the body shop facility shall not exceed: 2.05 pounds of particulate emissions (PE) per hour, 2.5 tons of PE per year, 2.05 pounds of PM10 per hour, and 2.5 tons of PM10 per year  see b)(2)a. through b)(2)d.
b.	OAC rules 3745-31-10 thru 20	see b)(2)d. through b)(2)g..
c.	OAC rule 3745-17-07(A)(1)	see b)(2)h.
d.	OAC rule 3745-17-07(B)(1)	see b)(2)h.
e.	OAC rule 3745-17-08(B), (B)(1)	see b)(2)h.
f.	OAC rule 3745-17-11(B)(1)	see b)(2)h.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 20.

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

c. The permittee shall allow no visible emissions of fugitive dust from building enclosing the processes comprising this emissions unit.



- d. The annual emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit at maximum particulate concentration of 0.0033 grains (gr) for PE and PM10 per dry standard cubic foot of exhaust gases (dscf) and a volumetric flow rate of 20,000 dry standard cubic feet per minute (dscfm) of exhaust. This restriction also demonstrates compliance with the hourly emissions limitation. Therefore, provided the grain loading and volumetric flow limitations are satisfied, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
  - e. The emissions of PE and PM10 from the body shop ventilation system shall not exceed 0.0033 grains per dry standard cubic foot (gr/dscf) of exhaust gases.
  - f. The combined emissions from all welding and grinding operations located at the body shop facility (P202 and P203) shall not exceed 2.05 pounds of PE per hour or 2.5 tons of PE per rolling, 12-month period.
  - g. The combined emissions from all welding and grinding operations located at the body shop facility (P202 and P203) shall not exceed 2.05 pounds of PM10 per hour or 2.5 tons of PM10 per rolling, 12-month period.
  - h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) The total installed exhaust rate from the body shop building shall not exceed a volumetric flow rate of 20,000 dry standard cubic feet per minute (dscfm).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the location and color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions



incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Director by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. Emission Limitation:  
  
5% opacity as a 6-minute average  
  
Applicable Compliance Method:

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



b. Emission Limitation:

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 using the methods and procedures specified in OAC rule 3745-17-03(B)(4). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

2.05 pounds of PE per hour, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.05 pounds of PE per hour.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on an exhaust gas particulate concentration (0.012 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) and 60 minutes per hour and then divided by 7000 grains per pound. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.

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

d. Emission Limitation:

2.5 tons of PE per year

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a worst case operating scenario of the maximum exhaust gas particulate concentration (0.0033 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) multiplied by 60 minutes per hour and 8760 hours per year, and divided by 7000 grains per pound and 2000 pounds per ton. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.

If required, the permittee shall establish site specific emissions factors through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-



17-03(B)(10). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

2.05 pounds of PM10 per hour, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.05 pounds of PM10 per hour.

Applicable Compliance Method:

This emission limitation was developed by one-time calculation based on an exhaust gas particulate concentration (0.012 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) and by 60 minutes per hour and then divided by 7000 grains per pound. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.

If required, the permittee shall establish site specific emissions factors in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

2.5 tons of PM10 per year, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.5 tons of PM10 per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a worst case operating scenario of the maximum exhaust gas particulate concentration (0.0033 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) multiplied by 60 minutes per hour and 8760 hours per year, and divided by 7000 grains per pound and 2000 pounds per ton. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.

If required, the permittee shall establish site specific emissions factors through emission testing performed in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

(1) None.



**3. P203, KTPO\_BIW**

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

Body in White (BIW) inspection and grinding process

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	emissions from all grinding operations located at the body shop facility shall not exceed: 2.05 pounds of particulate emissions (PE) per hour, 2.5 tons of PE per year, 2.05 pounds of PM10 per hour, and 2.5 tons of PM10 per year  see b(2)a. through b)(2)d.
b.	OAC rules 3745-31-10 thru 20 (PTI 04-01357, issued 8/31/2004)	see b)(2)d. through b)(2)g.
c.	OAC rule 3745-17-07(A)(1)	see b)(2)h.
d.	OAC rule 3745-17-07(B)(1)	see b)(2)h.
e.	OAC rule 3745-17-08(B), (B)(1)	see b)(2)h.
f.	OAC rule 3745-17-11(B)(1)	see b)(2)h.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 thru 20.

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

c. The permittee shall allow no visible emissions of fugitive dust from building enclosing the processes comprising this emissions unit.



- d. The annual emission limitations were established for PTI purposes to reflect the uncontrolled potential to emit for this emissions unit at maximum particulate concentration of 0.0033 grains (gr) for PE and PM10 per dry standard cubic foot of exhaust gases (dscf) and a volumetric flow rate of 20,000 dry standard cubic feet per minute (dscfm) of exhaust. This restriction also demonstrates compliance with the hourly emissions limitation. Therefore, provided the grain loading and volumetric flow limitations are satisfied, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
  - e. The emissions of PE and PM10 from the body shop ventilation system shall not exceed 0.0033 grains per dry standard cubic foot (gr/dscf) of exhaust gases.
  - f. The combined emission from all welding and grinding operations located at the body shop facility (P202 and P203) shall not exceed 2.05 pounds of PE per hour or 2.5 tons of PE per rolling, 12-month period.
  - g. The combined emission from all welding and grinding operations located at the body shop facility (P202 and P203) shall not exceed 2.05 pounds of PM10 per hour or 2.5 tons of PM10 per rolling, 12-month period.
  - h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c) Operational Restrictions
- (1) The total installed exhaust rate from the body shop building shall not exceed a volumetric flow rate of 20,000 dry standard cubic feet per minute (dscfm).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the location and color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; andany corrective actions taken to eliminate the visible emissions. If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may



indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Director by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

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



b. Emission Limitation:

no visible emissions of fugitive dust

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 using the methods and procedures specified in OAC rule 3745-17-03(B)(4). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

2.05 pounds of PE per hour, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.05 pounds of PE per hour.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on an exhaust gas particulate concentration (0.012 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) and 60 minutes per hour and then divided by 7000 grains per pound. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 dscfm.

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

d. Emission Limitation:

2.5 tons of PE per year, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.5 tons of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a worst case operating scenario of the maximum exhaust gas particulate concentration (0.0033 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) multiplied by 60 minutes per hour and 8760 hours per year, and divided by 7000 grains per pound and 2000 pounds per ton. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.



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

e. Emission Limitation:

2.05 pounds of PM10 per hour, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.05 pounds of PE per hour.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on an exhaust gas particulate concentration (0.012 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) and 60 minutes per hour and then divided by 7000 grains per pound. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.

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

f. Emission Limitation:

2.5 tons of PM10 per year, and

the combined emission from all welding and grinding operations located at the body shop facility shall not exceed 2.5 tons of PM10 per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by a one-time calculation based on a worst case operating scenario of the maximum exhaust gas particulate concentration (0.0033 gr/dscf) multiplied by the maximum combined exhaust gas flow rate (combined total of 20,000 dscfm) multiplied by 60 minutes per hour and 8760 hours per year, and divided by 7000 grains per pound and 2000 pounds per ton. Testing performed on October 18, 2012 demonstrated a particulate concentration of 0.000041 gr/cuft at 18,000 scfm.

If required, the permittee shall establish site specific emissions factors through emission testing performed in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



**Final Permit-to-Install**  
KUKA Toledo Production Operations  
**Permit Number:** P0110907  
**Facility ID:** 0448011730  
**Effective Date:** 2/15/2013

g) Miscellaneous Requirements

(1) None.