



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

2/20/2013

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0448011731  
Permit Number: P0112944  
Permit Type: OAC Chapter 3745-31 Modification  
County: Lucas

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

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, 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  
Chrysler Group LLC- Wrangler Paint Facility**

Facility ID: 0448011731  
Permit Number: P0112944  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 2/20/2013  
Effective: 2/20/2013





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

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## Authorization

Facility ID: 0448011731  
Facility Description: Paint Shop portion of Automotive and Light Duty Truck Assembly  
Application Number(s): A0046858  
Permit Number: P0112944  
Permit Description: Chapter 31 modification to the topcoat curing ovens resulting in an additional 5.0 mmBtu/hr natural gas burner capacity. (As fuel usage is restricted on a facility-wide basis, the additional burner capacity will not result in an increase the facility's potential to emit of air contaminants).  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$200.00  
Issue Date: 2/20/2013  
Effective Date: 2/20/2013

This document constitutes issuance to:

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

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

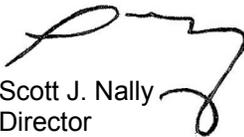
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install**  
Chrysler Group LLC- Wrangler Paint Facility  
**Permit Number:** P0112944  
**Facility ID:** 0448011731  
**Effective Date:** 2/20/2013

## Authorization (continued)

Permit Number: P0112944

Permit Description: Chapter 31 modification to the topcoat curing ovens resulting in an additional 5.0 mmBtu/hr natural gas burner capacity. (As fuel usage is restricted on a facility-wide basis, the additional burner capacity will not result in an increase the facility's potential to emit of air contaminants).

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>K303</b>
Company Equipment ID:	Topcoat
Superseded Permit Number:	P0110183
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Chrysler Group LLC- Wrangler Paint Facility  
**Permit Number:** P0112944  
**Facility ID:** 0448011731  
**Effective Date:** 2/20/2013

## **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**  
Chrysler Group LLC- Wrangler Paint Facility  
**Permit Number:** P0112944  
**Facility ID:** 0448011731  
**Effective Date:** 2/20/2013

## **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. Facility-wide restrictions on fuel oil and natural gas combustion established under the authority of OAC rule 3745-31-05(D) and OAC rules 3745-31-10 thru 27 in PTI 04-01358 as issued Sept 9, 2004 and modified by this permitting action:
  - a) Applicable Emissions Limitations:
    - (1) The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
      - a. 36.40 tons of CO per rolling, 12-month period,
      - b. 37.89 tons of NOx per rolling, 12-month period,
      - c. 1.09 tons of PE per rolling, 12-month period,
      - d. 3.65 tons of PM10 per rolling, 12-month period,
      - e. 9.19 tons of SO2 per rolling, 12-month period, and
      - f. 2.36 tons of VOC per rolling, 12-month period.
    - (2) These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting a maximum 845 mmscf per year of natural gas and a maximum 250,000 gallons per year of fuel oil. Therefore, if compliance is shown with the fuel usage limitations, compliance shall also be shown with the annual emission limitations.
  - b) Operational Restrictions
    - (1) The maximum annual natural gas usage for emissions units B301 through B333, K301, K302, K303, K404 and K405 shall not exceed 845 mmscf, based upon a rolling, 12 month summation of the natural gas usage figures.
    - (2) The maximum annual fuel oil usage for emissions units B301 and B304 shall not exceed 250,000 gallons, based upon a rolling, 12-month summation of the fuel oil usage figures.
    - (3) This facility has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas and fuel oil usage figures, upon issuance of this permit.
  - c) Monitoring and/or Recordkeeping Requirements
    - (1) The permittee shall properly install, operate, and maintain equipment to monitor the total quantity of natural gas (in cubic feet) and fuel oil burned in all emissions units located at the paint shop facility. The monitoring equipment shall be installed, calibrated, operated,



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

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

d) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include an identification of all exceedances of the rolling, 12-month natural gas usage limitation, and the actual cumulative quantity of fuel burned for each such month.
- (2) The permittee shall submit quarterly deviation (excursion) reports that include an identification of all exceedances of the rolling, 12-month fuel oil usage limitation, and the actual cumulative quantity of fuel burned for each such month.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

e) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

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



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

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

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

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

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



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

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

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

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

d. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

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

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

e. Emission Limitation:

9.19 tons of SO2 per rolling, 12-month period

Applicable Compliance Method:

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



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

f. Emission Limitation:

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

Applicable Compliance Method:

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

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

3. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart MM: K303. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.



4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K303. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.
5. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

The following emissions unit in this permit is subject to the aforementioned requirements: K303.



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



**1. K303, Topcoat**

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

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

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

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-09(C)(1)(c)	Combined emissions from the paint booth and curing oven stacks shall not exceed 2.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, or 15.1 pounds VOC per gallon of deposited solids.  See b)(2)n.
g.	40 CFR Part 60 Subpart A (40 CFR 60.1 through 60.19)	See b)(2)o.
h.	40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398)  In accordance with 40 CFR 63.390(a), this emissions unit is an automobile or light-duty truck assembly plant topcoat operation subject to the emission limitations/control measures specified in this section.	See b)(2)n. and b)(2)p.
i.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)q.
j.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176)  In accordance with 40 CFR 63.3081(b), this emissions unit is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)r.  [63.3091(a) and (b)]
21.24 mmBtu/hour indirect fired, low NOx, natural gas clearcoat oven burners (combustion emissions)		
k.	OAC rule 3745-31-05(A)(3) (PTI 04-01358 as issued 9/2/2004)	Combined emissions from the stack(s) associated with the oven combustion gases shall not exceed: 0.083 pound carbon monoxide (CO) per mmBtu, 1.77 pounds of CO per hour, 7.76 tons of CO per year, 1.81 pounds of nitrogen oxides (NOx) per hour, 7.93 tons of NOx per year, 0.04 pound of PE per hour, 0.18 ton of PE per year,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.16 pound of PM10 per hour, 0.70 ton of PM10 per year, 0.0006 pound of sulfur dioxide (SO2) per mmBtu, 0.02 pound of SO2 per hour, 0.06 ton of SO2 per year, 0.12 pound of VOC per hour, 0.53 ton of VOC per year, and see b)(2)s. and b)(2)t.
l.	OAC rule 3745-31-05(D) (PTI 04-01358 as issued 9/2/2004)	See b)(2)u. and b)(2)v.
m.	OAC rule 3745-31-10 thru 20 (PTI 04-01358 as issued 9/2/2004)	0.085 pound NOx per mmBtu, 0.0019 pound PE per mmBtu, 0.0075 pound of PM10 per mmBtu, and see b)(2)u. and b)(2)w.
n.	OAC rule 3745-31-21 thru 27 (PTI 04-01358 as issued 9/2/2004)	0.085 pound NOx per mmBtu, 0.0054 pound VOC per mmBtu, and see b)(2)u. and b)(2)x.
o.	OAC rule 3745-17-07(A)(1)	See b)(2)n.
p.	OAC rule 3745-17-10(B)(1)	See b)(2)n.
q.	OAC rule 3745-18-06(A)	See b)(2)y.
r.	40 CFR Part 63 Subpart A	See b)(2)z.
s.	40 CFR Part 63 Subpart DDDDD (63.7480 through 63.7575)  In accordance with 40 CFR 63.7485, this emissions unit is a process heater located at a facility which is a major source of hazardous air pollutants (HAPs) subject to the emission limitations/control measures specified in this section.	applicable emission limits in Tables 1 and 2; work practice standards in Table 3 and operating limits in Table 4 to Subpart DDDDD of 40 CFR Part 63 (subject to change based on the issuance of the Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD by U.S. EPA)  See b)(2)aa.
14.0 mmBtu/hour natural gas fired regenerative thermal oxidizer shared by K301 and K303 (combined combustion emissions)		
t.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (P0108955 as issued 11/16/2011)	1.16 pounds of CO per hour, 5.11 tons of CO per year, 1.19 pounds of NOx per hour, 5.24 tons of NOx per year, 0.03 pound of PE per hour, 0.13 ton of PE per year, 0.11 pound of PM10 per hour, 0.50 ton of PM10 per year, 0.019 pound of SO2 per hour, 0.093 ton of SO2 per year, 0.084 pound of VOC per hour,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0. 37 ton of VOC per year, 5% opacity as a 6 minute average, and see b)(2)t. and b)(2)bb.
u.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/1/06 (P0108955 as issued 11/16/2011)	See b)(2)cc.

(2) Additional Terms and Conditions

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



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

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

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

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

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

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

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

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

Where:

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

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

$\mu$  = the overall capture and control efficiency for the control equipment stated as a decimal fraction

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



- n. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- o. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 60.
- p. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- q. Table 2 to Subpart IIII of 40 CFR Part 63 provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
- r. The combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;  
  
or  
  
if each individual material added to the electrodeposition primer system contains no more than 1.0 percent by weight of any organic HAP and 0.10 percent by weight of any organic HAP, or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.
- s. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-31-10 thru 27, 40 CFR Part 63 Subpart A and 40 CFR Part 63 Subpart DDDDD.
- t. These emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.



- u. The combustion gas emissions limitations were established for PTI purposes to reflect the potential to emit for this facility while combusting natural gas at a facility-wide maximum annual gas usage rate of 845 mmscf, and a facility-wide maximum annual fuel oil usage rate of 250,000 gallons, based upon a rolling, 12-month summation of the fuel usage figures made enforceable in section B.2. of this permit.
- v. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, K404 and K405 shall not exceed the following:
  - i. 36.40 tons of CO per rolling, 12-month period; and
  - ii. 9.19 tons of SO<sub>2</sub> per rolling, 12-month period.
- w. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
  - i. 37.89 tons of NO<sub>x</sub> per rolling, 12-month period,
  - ii. 1.09 tons of PE per rolling, 12-month period, and
  - iii. 3.65 tons of PM<sub>10</sub> per rolling, 12-month period
- x. The combined emissions from the combustion of fuel oil and natural gas in B301, B303 through B310, K301, K302, K303, K404 and K405 shall not exceed the following:
  - i. 37.89 tons of NO<sub>x</sub> per rolling, 12-month period, and
  - ii. 2.36 tons of VOC per rolling, 12-month period.
- y. OAC rule 3745-18-06(A) does not establish SO<sub>2</sub> emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.



EPA approves the revisions to OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

- z. The permittee is subject to the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions), as set forth in Table 10 of Subpart DDDDD.
- aa. The requirements of 40 CFR Part 63, Subpart DDDDD are currently effective due to the January 9, 2012 decision by the United States District Court for the District of Columbia to vacate the administrative stay that U.S. EPA put in place during the reconsideration of the March, 2011 final rules. On February 7, 2012, U.S. EPA issued a "No Action Assurance" letter to facilities and indicated that U.S. EPA will exercise its enforcement discretion to not pursue enforcement action of violations of the Initial Notification deadlines established in the rule. This letter further notes that U.S. EPA has proposed revisions to the compliance dates for all units (the date by which a unit must be in compliance with the substantive requirements in the Boiler MACT rule) and to the subcategories for some units. U.S. EPA plans to issue a Final Action on Reconsideration of 40 CFR Part 63, Subpart DDDDD in the spring of 2012.
- bb. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- cc. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the thermal oxidizer combustion emissions of carbon monoxide (CO), nitrogen oxides (NOx), particulate (PE), particulate matter less than or equal to 10 microns in diameter (PM10), sulfur dioxide (SO2), and volatile organic compound (VOC) from this air contaminant source since the uncontrolled potential to emit for CO, NOx, PE, PM10, PM2.5, SO2, and VOC is less than 10 tons per year.

c) Operational Restrictions

- (1) The following term shall become void after USEPA approves the OAC rule 3745-18-06 revisions:



The permittee shall burn only natural gas having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet in this emissions unit.

- (2) The following term shall become effective after USEPA approves the OAC rule 3745-18-06 revisions:

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

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

d) **Monitoring and/or Recordkeeping Requirements**

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



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

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

- (6) The permittee shall perform monthly checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from all stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the location and color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of any visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions. See 40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398).

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



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
- (2) The permittee shall submit quarterly reports which identify any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.
- (3) The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within any thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- (4) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation for the topcoat process
- (5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum coating utilization exceeds the applicable limitation, i.e.,  $(1-\mu)\sum_{i=1}^n(Q_i)(VOC_i) \div 2000 \text{ pounds/ton} > 300.6 \text{ tons}$  in any rolling, 12-month period.
- (6) The permittee shall submit semiannual reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) any corrective actions taken to eliminate the visible particulate emissions.
- (7) The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (9) See 40 CFR Part 60 Subpart MM (40 CFR 60.390 through 60.398).
- (10) See 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 through 63.3176).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation;  
5% opacity, as a six-minute average  
Applicable Compliance Method;



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

b. Emission Limitation;

no visible emissions of fugitive dust

Applicable Compliance Method:

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

c. Emission Limitation:

4.8 pounds of PE per hour

Applicable Compliance Method:

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

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

where:

E = particulate emission rate (pounds/hour)

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

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

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

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



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

Applicable Compliance Method:

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

- e. Emission Limitation:

0.0015 gr PM10/dscf

Applicable Compliance Method:

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

- f. Emission Limitation:

30 pounds of PM10 per hour

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 201 and 202 of 40 CFR Part 52 Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- g. Emission Limitation:

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

Applicable Compliance Method:

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



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

If required, the permittee shall establish compliance through emission testing of K303 for the exhaust gas particulate concentration and the combined exhaust gas flow rate, performed in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation:

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

Applicable Compliance Method:

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

i. Emission Limitation:

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

Applicable Compliance Method

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

j. Emission Limitation:

247 pounds of VOC per hour

Applicable Compliance Method:

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



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 or Method 24 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

k. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

Applicable Compliance Method:

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

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

1.47 kilograms of VOC per liter (12.3 pounds of VOC per gallon) of applied coating solids on a monthly basis.

Applicable Compliance Method:

The permittee shall use the procedures in 40 CFR Part 60.393 for determining the monthly volume-weighted average mass of VOC emitted per volume of applied solids. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

combined HAP emissions shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month.



Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3161. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

combined HAP emissions shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3171. Alternate, USEPA approved testing, may be used with prior written approval from the Ohio EPA.

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

- a. Emission Limitation;

5% opacity, as a six-minute average

Applicable Compliance Method;

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

- b. Emission Limitation:

0.083 pound of CO per mmBtu

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



c. Emission Limitation:

1.77 pounds of CO per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

7.76 tons of CO per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.083 pound of CO per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

e. Emission Limitation:

0.085 pound of NO<sub>x</sub> per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 50 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

1.81 pounds of NO<sub>x</sub> per hour



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NOx per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

7.93 tons of NOx per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.085 pound of NOx per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

h. Emission Limitation:

0.0019 pound of PE per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

i. Emission Limitation:

0.04 pound of PE per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0019 pound of PE per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour).



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- j. 0.18 ton of PE per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly maximum heat input (21.24 mmBtu/hour) by the allowable emission limitation (0.0019 pound of PE per mmBtu) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- k. Emission Limitation:

0.0075 pound of PM10 per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 7.6 pounds of PM10 per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

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

- l. Emission Limitation:

0.16 pound of PM10 per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour).

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



m. Emission Limitation:

0.70 ton of PM10 per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0075 pound of PM10 per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

n. Emission Limitation:

0.0006 pound of SO2 per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO2 emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

o. Emission Limitation:

0.02 pound of SO2 per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO2 per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

p. Emission Limitation:

0.06 ton of SO2 per year



Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0006 pound of SO<sub>2</sub> per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.

q. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

r. Emission Limitation:

0.12 pound of VOC per hour

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

s. Emission Limitation:

0.53 ton of VOC per year

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable emission limitation (0.0054 pound of VOC per mmBtu) by the maximum heat input of the burners (21.24 mmBtu/hour) and by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds/ton.



- t. The combined emissions from the combustion of fuel oil and natural gas in B301 through B333, K301, K302, K303, K404 and K405 shall not exceed the following:
  - 36.40 tons of CO as a rolling, 12-month summation
  - 37.89 tons of NOx as a rolling, 12-month summation
  - 1.09 tons of PE as a rolling, 12-month summation
  - 3.65 tons of PM10 as a rolling, 12-month summation
  - 9.19 tons of SO2 as a rolling, 12 month summation
  - 2.36 tons of VOC as a rolling, 12-month summation

Applicable Compliance Method:

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

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

- a. Emission Limitation;
  - 5% opacity, as a six-minute average

Applicable Compliance Method;

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

- b. Emission Limitation:
  - 1.16 pounds of CO per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 10 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

- c. Emission Limitation:
  - 5.11 tons of CO per year



Applicable Compliance Method:

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

d. Emission Limitation:

1.19 pounds of NO<sub>x</sub> per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 7 of 40 CFR Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

5.24 tons of NO<sub>x</sub> per year

Applicable Compliance Method:

Compliance shall be demonstrated by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This emission limitation was developed by multiplying the allowable emission limitation (1.19 pounds of NO<sub>x</sub> per hour) by 8760 hours per year, and then dividing by 2000 pounds per ton.

f. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. 0.13 ton of PE per year

Applicable Compliance Method:

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



h. Emission Limitation:

0.11 pound of PM10 per hour

Applicable Compliance Method:

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

i. Emission Limitation:

0.50 ton of PM10 per year

Applicable Compliance Method:

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

j. Emission Limitation:

0.019 pound of SO2 per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

k. Emission Limitation:

0.083 ton of SO2 per year

Applicable Compliance Method:

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

l. Emission Limitation:

0.084 pound of VOC per hour



Applicable Compliance Method:

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

m. Emission Limitation:

0.37 ton of VOC per year

Applicable Compliance Method:

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

(4) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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



- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the local air agency' refusal to accept the results of the emission test(s).
  - f. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.
- g) **Miscellaneous Requirements**
- (1) Should any coating formulations cause an odor, or process changes cause an increase in the quantity or intensity of odors emitted from this facility, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.