



State of Ohio Environmental Protection Agency

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04/18/08

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77  
permit**

08-57-10-1349  
General Motors Corporation - Moraine Assembly  
Eddie R. Beckley  
2601 W Stroop Rd.  
Dayton, OH 45439

Dear Eddie R. Beckley:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by RAPCA within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall  
Permit Review/Development Section  
Ohio EPA, Division of Air Pollution Control  
122 South Front Street  
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact RAPCA.

Sincerely,

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

cc: USEPA (electronically submitted)  
File, DAPC PIER  
RAPCA  
Indiana  
Kentucky



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 04/18/08

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 08-57-10-1349 to:
General Motors Corporation - Moraine Assembly
2601 W Stroop Rd.
Dayton, OH 45439

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description. Rows include B001 (Plantwide Process Natural Gas Usage), G001 (Gasoline Operation), K020 (Pre-Phosphate Washers), K022 (Primer Surfacer), K023 (Topcoat System), K025 (Final Repair), K027 (Miscellaneous Sealers & Adhesives), K028 (Miscellaneous Solvent Usage), K029 (Prime Coat), K031 (Windshield Glass System), K034 (Maintenance Paint Booth), and K035 (Hinge Sealer).

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

Ohio Environmental Protection Agency

Chris Korleski
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. 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, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply

reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 4. Title IV Provisions

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

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## 5. Severability Clause

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

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(9))

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.  
(Authority for term: OAC rule 3745-77-07(A)(10))

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such

emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).  
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.  
(Authority for term: OAC rule 3745-77-07(G))

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.  
(Authority for term: OAC rule 3745-77-07(I))

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.  
(This term is provided for informational purposes only.)

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**19. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

*(Authority for term: OAC rule 3745-77-01)*

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**2. Records Retention Requirements**

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.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

**5. Permit Transfers**

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforceable Section

1. The following emissions units contained in this permit are subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Truck 40 CFR Part 63, Subpart IIII: K022, K023, K025, K027, K028, K029, K031 and K035.

The complete MACT requirements have been established in the Title V permit for this facility which will encompass these emissions units upon reissuance. The applicable sections of the 40 CFR Part 63, Subpart IIII have been cited in the appropriate sections for the emissions units subject to this rule.

3. The following insignificant emission units are located at this facility:

Z014 - solvent cold cleaners  
Z023 - emergency diesel generators

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

4. Operation Restrictions-

- a. The maximum annual number of production days of operation for this facility shall not exceed 310, based upon a rolling, 12-month summation of the number of days of operation each month (except for final repair, emissions unit K025).

- b. The maximum annual production rate for this facility shall not exceed 384,400 vehicles, based upon a rolling, 12-month summation of the vehicle production rate each month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI # 08-2506 ]

5. Monitoring and/or Record Keeping Requirements-

The permittee shall maintain the following information each month for the facility:

- a. The number of vehicles produced.
- b. The rolling, 12-month summation of the vehicle production rates.
- c. The number of days of operation.
- d. The rolling, 12-month summation of the numbers of days of operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI # 08-2506 ]

**A. State and Federally Enforceable Section (continued)**

**6. Reporting Requirements-**

The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. all exceedances of the number of days of operation restriction of 310 (except final repair emissions unit K025); and
- b. all exceedances of the vehicle production rate restriction of 384,400.

The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI # 08-2506 ]

## **B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

P001- EDP sanding booth  
P002- Guidecoat and minor topcoat sanding booth  
P003- Topcoat Sanding Booth  
P004- Final repair sanding  
T006- Tank #6 engine oil  
T007- Tank #7 auto transmission fluid  
T008- Tank #8 anti-freeze  
T009- Tank #9 anti-freeze  
T010- tank #10 windshield washer solvent  
T011- Tank #11 axle lube  
T012- Tank #12 power steering fluid  
T013- Tank #13 diesel fuel  
Z010- Roll Test  
Z011- Laboratory equipment and laboratory fume hoods  
Z012- Compression and Injection plastic molding equipment  
Z013- Non-continuous solvent recycling units  
Z015- Grinding, machining and abrasive pneumatic conveying  
Z016- Maintenance welding  
Z017- Arc welding  
Z018- Resistance spot welding  
Z019- Multi-stage phosphate system  
Z020- Feather dusters  
Z021- Vehicle washers prior to shipping  
Z022- Bulk storage material transferring equipment  
Z024- High pressure water cleaning equipment  
Z025- Vehicle fluid fill operations  
Z026- Miscellaneous aerosol spray cans  
Z027- Mechanical repair stalls  
Z028- Mobile equipment battery charging areas  
Z029- Engine subassembly line  
Z030- Radiator subassembly line  
Z031- Trim assembly line  
Z032- Gasoline tank assembly area  
Z033- Material storage  
Z034- Paint pump repair shop  
Z035- Wet/dry sanding booths  
Z036- Leak test areas  
Z037- Parts washer and rinse tanks using detergent cleaners  
Z038- Storage tanks for inorganic liquids including water  
Z039- Pressurized storage tanks for propane, butane and LPG  
Z040- Storage tanks for liquids(<700 gallons)  
Z041- Cleanup activities-onsite removal or removal action  
Z042- Maintenance of interior/exterior building structures

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Z043- Gasoline dispensing facilities  
Z044- Pre-washers  
Z045- Spot sanding and painting

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Plantwide Process Natural Gas Usage (B001)  
**Activity Description:** Plantwide process natural gas usage

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B001- Facility-wide, natural gas combustion (excluding ELPO Unit K029)	OAC rule 3745-31-05(A)(3) PTI #08-2506	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-18-06(A), 3745-18-06(E), 3745-21-08(B) and 40 CFR, Part 52.21.
		The particulate emissions (PE) from this emissions unit shall not exceed 17.0 tons/yr based upon a rolling, 12-month summation.
		The carbon monoxide (CO) emissions from this emissions unit shall not exceed 71.40 tons/yr based upon a rolling, 12-month summation.
		The volatile organic emissions (VOC) emissions from this emissions unit shall not exceed 4.68 tons/yr based upon a rolling, 12-month summation.
	40 CFR, Part 52.21	The nitrogen oxide (NOx) emissions from this emissions unit shall not exceed 135.58 tons/yr based upon a rolling, 12-month summation.
	OAC rule 3745-17-10(B)(1)	See A.I.2.a.
	OAC rule 3745-17-07(A)	The visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) [see A.I.2.b].
	OAC rule 3745-18-06 (A)	See A.I.2.d.
	OAC rule 3745-18-06 (E)	exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.c.)
	OAC rules 3745-21-08(B)	See A.I.2.e.

**2. Additional Terms and Conditions**

- 2.a** "Fuel burning equipment" as defined under OAC rule 3745-17-01(B)(5) are subject to an allowable particulate emission rate of 0.020 lb/mmBtu of actual heat input in accordance with OAC rule 3745-17-10(B)(1).
- 2.b** For equipment that combust natural gas, but are not "fuel burning equipment" as defined by OAC rule 3745-17-01(B)(5), gaseous fuels are not considered as part of the process weight for any single, specific process and, therefore, are not included in the process weight rate for determining the allowable particulate emission rate pursuant to Table I of OAC rule 3745-17-11. In addition, the uncontrolled mass rate of particulate emissions from any such piece of equipment are less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.
- 2.c** There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for equipment associated with this emissions unit that are not considered "fuel burning equipment" because the process weight rate is less than 1,000 pounds/hour.
- 2.d** OAC rule 3745-18-06(A) does not establish sulfur dioxide 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 emissions 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).
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 08-2506.

**II. Operational Restrictions**

- 1.** The maximum annual facility-wide natural gas consumption at the Moraine Assembly Plant shall not exceed 1,700 million cubic feet, based upon a rolling, 12-month summation of the monthly natural gas usage rates. This facility-wide natural gas consumption restriction excludes natural gas consumption for emissions unit K029, prime coat (ELPO) line with oven, which replaced emissions unit K021.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

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

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall maintain monthly records of the following information for the facility:
  - a. the natural gas usage rate, in mm cu. ft; and
  - b. the rolling, 12-month summation of the monthly natural gas usage rates, in mm cu. ft.

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

### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2 and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage restriction of 1,700 mm cu. ft.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

3. The permittee shall submit annual reports that specify the total actual annual facility-wide natural gas consumption (excluding emissions unit K029) for the previous calendar year, PE, NOx, CO, and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

The permittee shall submit annual reports that specify the These reports shall be submitted by January 31 of each year.

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

- 1.a** Emission Limitation -  
The actual heat input shall not exceed 0.020 lb PE per mmBtu.

Applicable Compliance Method-

Compliance may be determined by dividing the AP-42 [Table 1.4-2 (revised 7/98)] emission factor of 1.9 lbs (filterable)/mm cu. ft. of natural gas by the heat content for natural gas of 1,000 mmBtu/mm cu. ft.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

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

- 1.b** Emission Limitation -  
The PE from this emissions unit shall not exceed 17.0 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the annual allowable PE limitation shall be assumed as long as compliance with the annual (based upon a rolling, 12-month summation) allowable natural gas usage restriction (excluding emissions unit K029) is maintained and the lb PE/mmBtu limitation is maintained.

The annual emission limitation was calculated by multiplying the maximum allowable facility-wide natural gas consumption rate (excluding emissions unit K029) of 1,700 mm cu. ft. (as a rolling, 12-month summation) by a nominal heat content of 1000 mmBtu/mm cu. ft. and by the allowable PE limitation of 0.020 lb PE/mmBtu, and then dividing by 2000 lbs/ton).

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

- 1.c** Emission Limitation -  
The NO<sub>x</sub> emissions from this emissions unit shall not exceed 135.58 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the annual allowable NO<sub>x</sub> emission limitation shall be assumed as long as compliance with the annual (based upon a rolling, 12-month summation) allowable natural gas usage restriction is maintained (the annual NO<sub>x</sub> emission limitation was calculated by multiplying the maximum allowable facility-wide natural gas consumption of 1,700 mm cu. ft. (as a rolling, 12-month summation) by a company-derived emission factor of 159.5 lbs NO<sub>x</sub>/mm cu. ft\*, and then dividing by 2000 lbs/ton).

\* The company-derived emission factor was based upon a natural gas ratio between process and thermal oxidizer abatement of 4.88 to 1.0 (or 83% to 17%) and the respective emission factors of 100 lbs NO<sub>x</sub>/mm cu. ft. for the process [(AP-42, Chapter 1.4 (revised 7/98)] and 450 lbs NO<sub>x</sub>/mm cu. ft. for the thermal oxidizer (company-derived)].

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

- 1.d** Emission Limitation -  
The CO emissions from this emissions unit shall not exceed 71.40 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the annual allowable CO emission limitation shall be assumed as long as compliance with the annual (based upon a rolling, 12-month summation) natural gas usage restriction is maintained (the annual CO emission limitation was calculated by multiplying the maximum allowable facility-wide natural gas consumption of 1,700 mm cu. ft. (as a rolling, 12-month summation) by the AP-42 emission factor [Chapter 1.4 (revised 7/98)] of 84 lbs CO/mm cu. ft., and then dividing by 2000 lbs/ton).

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

## **V. Testing Requirements (continued)**

- 1.e** Emission Limitation -  
The VOC emissions from this emissions unit shall not exceed 4.68 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance with the annual allowable VOC emission limitation shall be assumed as long as compliance with the annual (based upon a rolling, 12-month summation) allowable natural gas usage restriction is maintained (the annual VOC emission limitation was calculated by multiplying the maximum allowable facility-wide natural gas consumption of 1,700 mm cu. ft. (as a rolling, 12-month summation) by the AP-42 emission factor [Chapter 1.4 (revised 7/98)] of 5.5 lbs VOC/mm cu. ft, and then dividing by 2000 lbs/ton).

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

- 1.f** Emission Limitation-  
The visible PE shall not exceed 20% opacity visible emission limitation, as a six-minute average.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Gasoline Operation (Tank #1&#2-Gasoline/Gasoline Fill) (G001)  
**Activity Description:** Gasoline Operation (Tank #1 & #2 - Gasoline/Gasoline fill)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
G001- gasoline storage tanks: 2-15,000 gallon above ground storage tanks	OAC rule 3745-21-09(R)	Stage I vapor control - 90% control efficiency for volatile organic compounds (VOCs), submerged fill
gasoline dispensing operation on the vehicle assembly line with Onboard Refueling Vapor Recovery (ORVR)	OAC rule 3745-21-09(DDD)	95% overall control efficiency for VOCs (See A.I.2.a.)
gasoline dispensing facility	OAC rule 3745-31-05(A)(3) PTI 08-3719	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(R) and 3745-21-09(DDD).  The organic compound (OC) emissions from this emissions unit shall not exceed 4.98 tons/yr.

##### 2. Additional Terms and Conditions

- All the vehicles filled by this gasoline dispensing facility shall be equipped with an ORVR system that achieves a 95% overall control efficiency for VOCs and meets the requirements of 40 CFR 86.099-8. Because an ORVR control system is employed, the other requirements of OAC rule 3745-21-09(DDD) relating to Stage II control systems are not relevant.

## II. Operational Restrictions

1. The permittee shall comply with the following operational restrictions for the Stage I vapor control system:
  - a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.
  - b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
  - c. There shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline.
  - d. The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. Each submerged fill pipe shall be installed so it is within six (6) inches of the bottom of the storage tank.
  - e. All fill caps shall be "in place" and clamped during normal storage conditions.
  - f. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

2. The gasoline throughput for this emissions unit shall not exceed 2,000,000 gallons, based upon a rolling, 12-month summation.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

## III. Monitoring and/or Record Keeping Requirements

1. OAC rule 3745-21-09(R) does not establish or require a regular leak-checking program. However, for any leak checks performed, the permittee shall maintain records including, at a minimum, the following information
  - a. Date of inspection.
  - b. Findings (may indicate no leaks discovered or location, nature, and severity of each leak).
  - c. Leak determination method.
  - d. Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days).
  - e. Inspector's name and signature.

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

2. The permittee shall maintain records of the gasoline throughput during each calendar month and during each rolling, 12-month period.

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

## IV. Reporting Requirements

1. Any leak from the vapor balance system that is not repaired within 15 days after identification shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the repair is completed.

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

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month gasoline throughput limitation of 2,000,000 gallons.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation-  
The OC emissions from this emissions unit shall not exceed 4.98 tons/yr.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be determined by summing the OC emissions from two gasoline storage tanks' filling and dispensing operations. This calculation shall be based on the annual gasoline throughput using either the EPA "TANKS" program or AP-42 emission factors. The emissions from the fueling of vehicles with ORVR shall be determined by multiplying the gallons of gasoline dispensed by an emission factor of 0.2 gram of VOC/gallon of gasoline (Federal Register/Vol.59. No.66/ Wednesday April 6, 1994/ Rules and Regulations).

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

- 1.b Emission Limitation-  
95% overall control efficiency for VOC's

Applicable Compliance Method-

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

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

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Pre-Phosphate Washers (K020)  
**Activity Description:** Pre-Phosphate washers

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K020- pre-phosphate washers; preclean deck	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The organic compound (OC) emissions from this emissions unit shall not exceed 8.3 lbs/hr, 133.4 lbs/day, and 20.01 tons/yr.  (The above annual OC emission limitation is based upon a rolling, 12-month summation.)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.1.2.b.
	OAC rule 3745-21-07(G)(2)	This emissions unit is exempt from the requirements of this rule per OAC rule 3745-21-07(G)(9)(g) in the Ohio State Implementation Plan (SIP).

##### 2. Additional Terms and Conditions

- 2.a The 8.3 lbs/hr OC limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The prohibition of the use of photochemically reactive material reflects a requirement established to exempt this emissions unit from the current Ohio SIP approved by the U.S. EPA. Ohio has requested that this part of the the SIP be modified to no longer have applicable limits, record keeping and reporting requirement for emissions units like this one, but the new requirements will not become federally enforceable until it is approved by the U.S. EPA as a revision to the Ohio SIP for organic compound emissions. When approved by the U.S. EPA, the prohibition of the use of photochemically reactive materials and OAC rule 3745-21-07(G)(2) shall no longer apply.

## II. Operational Restrictions

1. The permittee shall employ only water-reducible detergent solutions having vapor pressures for the organics that do not exceed 0.1 mmHg.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each material employed.
  - b. The OC content of each material employed, in pounds per gallon.
  - c. The number of gallons of each material employed.
  - d. The total OC emissions from all the materials employed (summation of (b x c) for all materials), in pounds.
  - e. The number of days the emissions unit was in operation.
  - f. The average daily OC emission rate for all the materials employed, i.e., (d/e), in pounds/day (average).
  - g. The rolling, 12-month summation of the monthly OC emission rates, in tons.
  - h. The OC vapor pressure of each material employed, in mmHg.

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

## IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 20.01 tons, the daily OC emission limitation of 133.4 lbs, and the vapor pressure limitation of 0.1 mmHg.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

#### **V. Testing Requirements**

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

- 1.a Emission Limitation -  
The OC emissions from this emissions unit shall not exceed 8.3 lbs/hr.

Applicable Compliance Method -  
Compliance with the OC emission limitation above may be determined by multiplying a company-derived OC emission factor of 0.115 lb OC/unit by the maximum hourly number of units produced (units/hr).

If required, the permittee shall demonstrate compliance with the OC emission limitation above in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

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

- 1.b Emission Limitation-  
The OC emissions from this emissions unit shall not exceed 133.4 lbs/day.

Applicable Compliance Method-  
Compliance with the daily OC emission limitation above shall also be based upon the record keeping requirements specified in Section A.III.1. of this permit.

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

- 1.c Emission Limitation-  
The OC emissions from this emissions unit shall not exceed 20.01 tons /yr, as a rolling, 12-month summation.

Applicable Compliance Method-  
Compliance with the annual OC emission limitation above shall also be based upon the record keeping requirements specified in Section A.III.1. of this permit.

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

2. The permittee shall use formulation data provided by the material manufacturer or USEPA Method 24 to determine the organic composition (OC content) of each material employed in this emissions unit.

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

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Primer Surfacer (Guidecoat) System (K022)  
**Activity Description:** Primer Surface (Guidecoat) System

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K022- primer surface system; powder guidecoat	OAC rule 3745-31-05(A)(3) PTI #08-2506	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.2 lbs/hr, 34.8 lbs/day, and 5.22 tons/yr VOC  (The above annual emission limitation is based upon a rolling, 12-month summation.)  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart A and Subpart IIII.
	OAC rule 3745-21-09(C)(1)(a)(v)	The VOC emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3091(b)  1.10 pounds of HAPs per gallon of coating solids deposited
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

## 2. Additional Terms and Conditions

- 2.a** The 2.2 lbs/hr VOC limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

## II. Operational Restrictions

1. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

2. The permittee shall employ only powder coatings in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. and A.III.3 The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a) notification and reports verifying compliance  
63.3130(b) information provided by suppliers or manufacturers  
63.3130(c)(1) required information for each coating used  
63.3130(c)(2) required information for each thinner used  
63.3130(c)(4) and (5) record of the of the organic HAP emission rates  
63.3130(c)(6)(i) and (ii) average mass organic HAP content  
63.3130(d) through (h) required overall records that should be maintained  
63.3130(m) transfer efficiency records  
63.3130(n) record of the work practice plan

3. The permittee shall collect and record the following information each month for this emissions unit:

- a. The name and identification number of each coating, as applied.
- b. The VOC content of each coating (in lbs/gallon, excluding water and exempt solvents), as applied.
- c. The number of gallons of each coating (excluding water and exempt solvents) employed.
- d. The total VOC emissions from all the coatings employed (summation of (bxc) for all coatings), in pounds.
- e. The number of days the emissions unit was in operation.
- f. The average daily OC emission rate for all the coatings employed, i.e., (d/e), in pounds/day (average).
- g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

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

#### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. and 3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 5.22 tons and of the daily VOC emission limitation of 34.8 pounds.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

#### V. Testing Requirements

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

- 1.a Emission limitation-  
The VOC emissions from this emissions unit shall not exceed 2.2 lbs/hr.

Applicable Compliance Method-

Compliance may be determined by multiplying the maximum hourly coatings usage rate [gallons (excluding water and exempt solvents)/hr] by the maximum VOC content of all of the coatings (lbs/gallon of coating, excluding water and exempt solvents).

If required, the permittee shall demonstrate compliance in accordance with Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

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

- 1.b Emission Limitation-  
The VOC emissions from this emissions unit shall not exceed 34.8 lbs/day.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.3. of this permit.

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

**V. Testing Requirements (continued)**

**1.c** Emission Limitation-  
The VOC emissions from this emissions unit shall not exceed 5.22 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method-  
Compliance shall be based upon the record keeping requirements specified in Section A.III.3. of this permit.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Topcoat System (K023)  
**Activity Description:** Topcoat System

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K023- topcoat system (See A.I.2.a.)	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The VOC content shall not exceed 0.99 kg of volatile organic compounds (VOC)/liter of coating solids applied or 8.24 lbs VOC/gallon of coating solids deposited.  The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 4913.76 lbs/day and 737.06 tons/yr, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]  (The above tons/yr emission limitation is a rolling, 12-month summation.)  See A.I.2.b - A.I.2.e.  The particulate emissions (PE) emissions from this emissions unit shall not exceed 19.71 tons/yr. See A.I.2.f.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), 40 CFR Part 63, Subpart A and Subpart IIII.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(C)(1)(c)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The particulate emissions (PE) emissions from this emissions unit shall not exceed 4.5 lbs/hr. See A.I.2.f.
	OAC rule 3745-17-07(A)	The visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3091(b)
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	1.10 pounds of HAPs per gallon of coating solids deposited 63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Sections A.III.2, 3, 7, 8, 9, 11, 12, 13 and 15, A.IV.2.e, 3, 4, 5 and 7.

**2. Additional Terms and Conditions**

- 2.a** The topcoat system consists of four identical lines. Each of these lines consists of an initial area for application of water-borne basecoat (with flash-off), followed by an area for application of clearcoat (with flash-off), followed by an area for demasking (with flash-off), followed by a bake oven. The VOC emissions from the clearcoat areas and a portion of the demasking areas are controlled through the application of a VOC concentrator and a thermal oxidizer. The VOC emissions from the four bake ovens are controlled through the application of individual thermal oxidizers.
- 2.b** The overall VOC capture efficiency for the clearcoat application areas, clearcoat flash-off areas, demasking areas, and bake ovens shall be equal to or greater than 79.4 percent, by weight.
- 2.c** The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.
- 2.d** The thermal oxidizer, associated with the clearcoat VOC concentrator, shall operate at a minimum VOC destruction efficiency of 95 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.
- 2.e** The clearcoat bake oven thermal oxidizers, shall each operate at a minimum VOC destruction efficiency of 90 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.
- 2.f** This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.

## II. Operational Restrictions

1. The maximum annual VOC usage, prior to the application of emission controls, shall not exceed 1302.89 tons, based upon a rolling, 12-month summation of the monthly VOC usage rates.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

2. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. through 14. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The average combustion temperature within each of the thermal oxidizers referenced in Sections A.I.2.d and A.I.2.e for each 3-hour block of time when the emissions unit is in operation and vehicles are being painted, shall not be more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emissions test that demonstrated the emissions units was in compliance.

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

3. The permittee shall operate a VOC concentrator wheel, when this emissions unit is in operation, as follows:

- a. The VOC concentrator wheel shall have an initial stationary layer of carbon.

- b. The number of revolutions per hour (RPH) of the VOC concentrator wheel shall be continuously maintained at a value within +/-1 RPH of the value established during the most recent emissions test that demonstrated the emissions unit was in compliance. Exception monitoring of the rotation (motion sensing) shall alarm in the paint shop maintenance dispatch area. [The variable frequency drive (VFD) reading of the VOC concentrator wheel established during the most recent emission testing that demonstrated compliance, conducted on 11/19/2002, was 35 Hz which equates to 3.4 RPH.]

- c. The VOC concentrator wheel shall have an operating desorption fan.

- d. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3 hour block of time, shall be maintained within the range of 200 to 280 degrees Fahrenheit.

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

4. The permittee shall operate the water wash when this emissions unit is in operation.

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

### III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain monthly records of the following information for this emissions unit:
- The VOC usage rate (uncontrolled) and VOC emission rate (controlled) [see calculation methodology in Section III.6 below], in tons. [The monthly VOC emission and usage rates shall be calculated 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-450/3-88-028, Dec.1988).]
  - The rolling, 12-month summation of the monthly VOC usage rates (uncontrolled), in tons.
  - The rolling, 12-month summation of the monthly VOC emission rates (controlled), in tons.

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

6. The permittee shall maintain records of the topcoat operation that will enable the calculation of the VOC emission rate from this emissions unit 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-450/3-88-028, Dec.1988).

The permittee shall calculate the VOC emission rate from all the coatings employed in the topcoat operation, in pounds of VOC per gallon of deposited solids, 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.

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

7. The permittee shall operate and maintain continuous temperatures monitors and recorders that measure and record the combustion temperature within each of the thermal oxidizers when the emissions unit is in operation. For each thermal oxidizer, the permittee shall utilize a continuous strip chart recorder. If the strip chart malfunctions, the permittee shall utilize a computer system that records the temperatures every second and at the end of the day prints out the high, low and average temperatures for the day. Units shall be in degrees Fahrenheit. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameters and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturers' recommendations, with any modifications deemed necessary by the permittee.

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

8. The permittee shall collect and record the following information for each day for the thermal oxidizers:
- A log of downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
  - All 3-hour blocks of time during which the average combustion temperature within any of the thermal oxidizers, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature measured during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

9. The permittee shall initiate an inspection and maintenance program designed to help ensure the control equipment is operating in accordance with the manufacturer's specifications. Such an I and M program shall outline the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the thermal oxidizers.

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

10. The permittee shall document whether or not the water wash was in service when the emissions unit was in operation.

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

### III. Monitoring and/or Record Keeping Requirements (continued)

11. The permittee shall operate and maintain the following sensors, monitors and recorders associated with the VOC concentrator wheel when this emissions unit is in operation:
- a. A motion sensor that will detect rotation of the VOC concentrator wheel. The sensor shall be connected to a system alarm that will notify the appropriate personnel that motion is not detected.
  - b. An operation sensor that will detect operation of the desorption fan, which controls air flow through the VOC concentrator wheel. The sensor shall be connected to a system alarm that will notify the appropriate personnel when the fan is not in operation.
  - c. A continuous temperature monitor and recorder that measures and records the temperature of the desorption air stream prior to the VOC concentrator wheel.

Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the average temperature for each of the 8, 3- hour blocks during the day. The permittee shall also maintain a log or record of the downtime for the capture (collection) system, control devices and monitoring equipment when the associated emissions unit was in operation.

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

12. The permittee shall perform a manual check of the rotational speed of the VOC concentrator wheel at least twice per calendar year. This check, and the determined RPH shall be noted in an operations log. [This check is performed to document the RPH and to verify the accuracy of the HZ readings.]

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

13. The permittee shall annually inspect the initial stationary layer of carbon in the VOC concentrator wheel to check for structural integrity and surface buildup that could cause blockage to this portion of the control system.

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

14. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

- 63.3130(a) notification and reports verifying compliance
- 63.3130(b) information provided by suppliers or manufacturers
- 63.3130(c)(1) required information for each coating used
- 63.3130(c)(2) required information for each thinner used
- 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
- 63.3130(c)(6)(i) and (ii) average mass organic HAP content
- 63.3130(d) through (h) required overall records that should be maintained
- 63.3130(m) transfer efficiency records
- 63.3130(n) record of the work practice plan

15. If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

#### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. through 11. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly deviation (excursion) reports that identify all exceedances of the following:

- a. the VOC content limitations of 0.99 kg VOC / liter of deposited coating solids (8.24 lbs VOC / gallon of deposited coating solids);

- b. the daily VOC emission limitation of 4913.76 pounds;

- c. the rolling, 12-month VOC usage rate restriction of 1302.89 tons;

- d. the rolling, 12-month VOC emission limitation of 737.06 tons;

- e. all 3-hour blocks of time during which the average combustion temperature within each of the thermal oxidizers was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.

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

3. The permittee shall submit quarterly deviation (excursion) reports, that include the following information for the VOC wheel concentrator associated with this emissions unit:

- a. An identification of all time periods during which the VOC wheel concentrator motion sensor and/or the desorption fan operation sensor alarms were activated and the process operation continued, when the emissions unit was in operation.

- b. An identification of all 3 hour blocks of time during which the average temperature of the desorption air stream prior to the VOC wheel concentrator wheel did not comply with the temperature limitation specified in Section A.II of this permit.

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

4. The permittee shall submit written reports that (a) identify each instance during which the manual check of the actual rotational speed of the concentrator (RPH) did not indicate compliance with the value established in Section A.III of this permit and/or did not correspond to 3.4 RPH for every 35 HZ and (b) describe any corrective actions taken to reestablish the proper concentrator rotational speed (RPH). These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

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

5. The permittee shall submit an annual report covering the inspection of the initial stationary layer of carbon in the VOC concentrator specified in Section A.III. of this permit. The report shall be submitted by February 15 of each year.

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

#### IV. Reporting Requirements (continued)

6. By February 15 of each year, and in accordance with Section 18 of the U.S. EPA's "Protocol for determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988), the permittee shall review the operating conditions and evaluate that the Transfer Efficiency is representative of the most recent test. A statement of this review must be kept on file at the site.

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

7. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control devices and/or monitoring equipment when the associated emissions unit was in operation.

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

8. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the water wash was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

9. The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

10. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

11. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

#### V. Testing Requirements

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

- 1.a Emission Limitation:  
The VOC content shall not exceed 0.99 kg VOC/liter of deposited coating solids (8.24 lbs VOC/gallon deposited coating solids), after controls.

Applicable Compliance Method -

The permittee shall demonstrate compliance with the VOC content limitation above based on the record keeping requirements in Section A.III.2 of this permit.

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

**V. Testing Requirements (continued)**

**1.b** Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 4913.76 lbs/day.

Applicable Compliance Method -

The permittee shall demonstrate compliance with the daily allowable VOC emission limitation above based on the record keeping requirements in Section A.III.5 of this permit.

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

**1.c** Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 737.06 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method -

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based on the record keeping requirements in Sections A.III.5 and 6 of this permit.

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

**1.d** Emission Limitation -

The PE from this emissions unit shall not exceed 4.5 lbs/hr.

Applicable Compliance Method -

The 4.5 lbs/hr limitation was developed from Table I utilizing a process weight of 1.15 tons per hour.

If required, compliance with the hourly allowable PE limitation shall be demonstrated in accordance with the methods in OAC rule 3745-17-03(B)(10).

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

**1.e** Emission Limitation -

The PE from this emissions unit shall not exceed 19.71 tons/yr.

Applicable Compliance Method -

The annual PE shall be calculated by multiplying the latest available, company-derived emission factor (lbs PE/unit produced) by the number of units produced per year, and dividing by 2000 lbs/ton.

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

**1.f** Emission Limitation-

The visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

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

**1.g** Emission Limitation-

The overall VOC capture efficiency for the clearcoat application areas, clearcoat flash-of areas, demasking areas, and bake ovens shall be equal to or greater than 79.4 percent, by weight.

Applicable Compliance Method-

Compliance with the VOC capture efficiency requirement above shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

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

## V. Testing Requirements (continued)

### 1.h Emission Limitation-

The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight, or a maximum concentration outlet of 10 ppm, as propane.

#### Applicable Compliance Method-

Compliance with the VOC removal efficiency or the outlet concentration requirements above shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit and also on the record keeping and monitoring requirements specified in Section A.III.5 of this permit.

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

### 1.i Emission Limitations-

The thermal oxidizer, following the clearcoat VOC concentrator, shall operate at a minimum VOC destruction efficiency of 95 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.

The clearcoat bake oven thermal oxidizers, shall each operate at a minimum VOC destruction efficiency of 90 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.

#### Applicable Compliance Method-

Compliance with the VOC destruction efficiency requirements above shall be based upon the results of emission testing conducted in accordance with the test methods outlined in Section A.V.2. of this permit.

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

### 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted approximately 2 years after permit issuance and within 6 months prior to permit expiration, or at approximately 2.5 year intervals starting with the date of the last test that showed compliance. At least one of the above mentioned test shall be conducted before any change out of carbon modules.

b. The emission testing shall be conducted to demonstrate compliance with the overall capture efficiency, the concentrator removal efficiency and the thermal oxidizers' destruction efficiencies.

c. The test(s) shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the RAPCA.

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

The following test method shall be employed to demonstrate compliance with removal/destruction efficiency requirements: Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. 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 alternative if such approval does not contravene any other applicable requirement. The control efficiency of the concentrator and thermal incinerator system shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of organic compounds or organic materials between the inlet and outlet of the control system. The control efficiencies of the concentrator and thermal oxidizers (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species presented and their total concentration, and on a consideration of the potential presence of interfering gases.

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

## **V. Testing Requirements (continued)**

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the RAPCA. 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 RAPCA's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the RAPCA 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 RAPCA.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K023- topcoat system	OAC rule 3745-17-11(C)	See B.I.2.

**2. Additional Terms and Conditions**

2. The permittee shall operate the waterwash control system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The waterwash system shall be employed during all periods of coating application to control particulate emissions.

**II. Operational Restrictions**

None

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

1. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system with any modifications deemed necessary by the permittee during the time period in which the waterwash is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
2. The permittee shall conduct periodic inspections of the waterwash control system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the waterwash control system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the waterwash control system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the waterwash control system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

3. In the event that the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the waterwash control system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the waterwash control system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

**IV. Reporting Requirements**

1. The permittee shall include in the quarterly report any record of the date and length of time the waterwash control system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency.

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Final Repair (K025)  
**Activity Description:** Final Repair

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K025- final repair system	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 88.81 lbs/day and 13.32 tons/yr*, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028].  * based on a rolling, 12-month summation  The particulate emissions (PE) from this emissions unit shall not exceed 3.10 tons/yr.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1)(d), 3745-17-11(B) and 3745-17-07(A) 40 CFR Part 63, Subpart A and Subpart IIII.
	OAC rule 3745-21-09(C)(1)(d)	The VOC content shall not exceed 4.8 lbs of VOC per gallon of coating, excluding water and exempt solvents (as a daily, volume-weighted average)
	OAC rule 3745-17-11(B)(1)	The PE from this emissions unit shall not exceed 0.71 lb/hr. See A.I.2.a.
	OAC rule 3745-17-07(A)	The visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3091(b)  1.10 pounds of HAPs per gallon of coating solids deposited
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

## 2. Additional Terms and Conditions

- 2.a** This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.

## II. Operational Restrictions

1. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:
- 63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. and 4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall collect and record the following information for each day for this emissions unit:
- The number of gallons, excluding water and exempt solvents, of each coating employed.
  - The daily, volume-weighted average VOC content of all the coatings [in pounds per gallon (excluding water and exempt solvents)], as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.
  - The total VOC emissions from all the coatings employed, in pounds [summation of (2.b x 1.a) for all coatings].

(The permittee shall be recording the required information for each day at the end of the calendar month.)

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

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content, in pounds per gallon (excluding water and exempt solvents) of each coating, as applied.
  - c. The total VOC emissions from all the coatings employed (calculated by summing the daily VOC emission rates (from Section 2.c above) for the calendar month, divided by 2000 lbs/ton), in tons.
  - b. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

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

4. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

- 63.3130(a) notification and reports verifying compliance
- 63.3130(b) information provided by suppliers or manufacturers
- 63.3130(c)(1) required information for each coating used
- 63.3130(c)(2) required information for each thinner used
- 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
- 63.3130(c)(6)(i) and (ii) average mass organic HAP content
- 63.3130(d) through (h) required overall records that should be maintained
- 63.3130(m) transfer efficiency records
- 63.3130(n) record of the work practice plan

### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. through 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of each daily record showing that the daily, volume-weighted average VOC content exceeded the applicable limitation of 4.8 lbs/gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

3. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the daily VOC emission limitation of 88.81 pounds; and
  - b. all exceedances of the rolling, 12-month VOC emission limitation of 13.32 tons.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

#### **IV. Reporting Requirements (continued)**

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

#### **V. Testing Requirements**

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

- 1.a Emission Limitation-

The VOC content shall not exceed 4.8 lbs VOC/gallon coating, excluding water and exempt solvents (daily, volume-weighted average).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

- 1.b Emission limitation-

The VOC emissions from this emissions unit shall not exceed 88.81 lbs/day.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

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

- 1.c Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 13.32 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method-

Compliance shall be based upon the record keeping specified in Sections A.III.2 and 3 of this permit.

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

- 1.d Emission Limitation-

The PE from this emissions unit shall not exceed 0.71 lb/hr.

Applicable Compliance Method:

The 0.71 lb/hr limitation was developed from Table I utilizing a process weight of 0.073 ton per hour.

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

**V. Testing Requirements (continued)**

- 1.e** Emission Limitation-  
The PE from this emissions unit shall not exceed 3.10 tons/yr.

Applicable Compliance Method-

The annual PE shall be calculated by multiplying the latest available, company-derived emission factor (lbs PE/unit produced) by the number of units produced per year, and dividing by 2000 lbs/ton.

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

- 1.f** Emission Limitation-  
The visible PE shall not exceed 20% opacity, as a six-minute average

Applicable Compliance Method-

If required, compliance shall be determined by visible emissions evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Final Repair	OAC rule 3745-17-11(A)(1)(k)	This emissions unit employ surface coating processes that employ hand-held cup spray guns. It is therefore. exempt from the requirements of OAC rule 3745-17-11(C).

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Miscellaneous Sealers & Adhesives (K027)  
**Activity Description:** Misc. Sealers & Adhesives

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K027- miscellaneous sealers & adhesives (plant-wide usage)	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 17.0 lbs/hr and 37.58 tons/yr*, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]
	OAC rule 3745-21-09(U)(1)(i)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i) and 40 CFR Part 63, Subpart A and Subpart IIII.
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	* based on a rolling, 12-month summation The VOC content shall not exceed 3.0 lbs VOC/gallons of coating, excluding water and exempt solvent. See 40 CFR Part 63.3091(c)
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	0.01 pounds of HAPs per pound of adhesive and sealer material 63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

##### 2. Additional Terms and Conditions

- 2.a The 17.0 lbs/hr VOC limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

## II. Operational Restrictions

1. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2 and 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.
  - c. The number of gallons, of each coating (excluding water and exempt solvents), as applied.
  - d. The total VOC emissions from all the coatings employed (summation of (b x c) for all coatings), in pounds.
  - e. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

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

3. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a) notification and reports verifying compliance  
63.3130(b) information provided by suppliers or manufacturers  
63.3130(c)(1) required information for each coating used  
63.3130(c)(2) required information for each thinner used  
63.3130(c)(4) and (5) record of the of the organic HAP emission rates  
63.3130(c)(6)(i) and (ii) average mass organic HAP content  
63.3130(d) through (h) required overall records that should be maintained  
63.3130(m) transfer efficiency records  
63.3130(n) record of the work practice plan

## IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. through 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

#### IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 37.58 tons.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

#### V. Testing Requirements

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

- 1.a Emission limitation-  
The VOC emissions from this emissions unit shall not exceed 17.0 lbs/hr.

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation may be determined by multiplying the maximum number of truck frames processed (number of truck frames processed/hr) by the most recent, company-derived emission factor (lb VOC/truck frame processed).

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

- 1.b Emission Limitation-  
The VOC emissions from this emissions unit shall not exceed 37.58 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

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

- 1.c Emission Limitation-  
The VOC content shall not exceed 3.0 lbs VOC/gallon coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If the permittee determines that 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

Facility Name: **General Motors Corporation - Moraine Assembly**  
Facility ID: **08-57-10-1349**  
Emissions Unit: **Miscellaneous Sealers & Adhesives (K027)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Miscellaneous Solvent Usage and Cleanup Operations (K028)  
**Activity Description:** Misc. Solvent Usage and Cleanup Operations

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K028- miscellaneous solvent usage/cleanup (flushing, wiping and brushing, floor cleaning, paint purging, booth cleaning, windshield cleaning, body wiping)	OAC rule 3745-31-05(A)(3) PTI #08-2506	The organic compound (OC) emissions from this emissions unit shall not exceed 629.0 tons/yr, based on a rolling, 12-month summation.
	OAC rule 3745-21-07(G)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), 40 CFR Part 63, Subpart A and Subpart IIII.  This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G)(2) in the Ohio State Implementation Plan (SIP).
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	See A.II.1.a. See 40 CFR Part 63.3091(b)  1.10 pounds of HAPs per gallon of coating solids deposited
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

##### 2. Additional Terms and Conditions

2. This emissions unit covers miscellaneous solvent usage and cleanup operations used throughout the entire facility.

## II. Operational Restrictions

- 1.a** The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited. This operational restriction applies only to the solvents employed in floor cleaning that is not related to coating booths and body wiping that occurs outside of the coating booths. The other solvent usages described in "Operations, Property and/or Equipment" are associated with emissions units that are subject to OAC rule 3745-21-09 and, therefore, are not subject to OAC rule 3745-21-07.

The prohibition on the use of photochemically reactive material shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the operation restriction, monitoring, record keeping and reporting requirements included in sections II.1.a, III.2.j and IV.3 shall be void.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

- 1.b** The prohibition of the use of photochemically reactive material reflects a requirement established to exempt this emissions unit from the current Ohio SIP approved by the U.S. EPA. Ohio has requested that this part of the the SIP be modified to no longer have applicable limits, record keeping and reporting requirements for emissions units like this one, but the new requirements will not become federally enforceable until it is approved by the U.S. EPA as a revision to the Ohio SIP for organic compound emissions. When approved by the U.S. EPA, the prohibition of the use of photochemically reactive materials and OAC rule 3745-21-07(G)(2) shall no longer apply.
- 2.** The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

- 1.** Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2 and 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The company's identification for each solvent employed.
  - b. The number of gallons of each solvent material (starting inventory).
  - c. The number of gallons of each solvent material received.
  - d. The number of gallons of each solvent material (ending inventory).
  - e. The number of gallons of each solvent material shipped off site for disposal.
  - f. The OC content of each solvent material employed, in lbs/gallon.
  - g. The OC emissions from each solvent material employed [ $f \times (b + c - d - e)$ ], in pounds.
  - h. The total OC emissions from all the solvent materials employed [summation of g for all solvents/2000], in tons.
  - i. The rolling, 12-month summation of the monthly OC emission rates, in tons.
  - j. For only those floor cleaning and body wiping solvents subject to OAC rule 3745-21-07, documentation on whether or not each solvent material employed is a photochemically reactive material.

[Note: After the revision to OAC rule 21-07(G) is approved into the Ohio SIP, section III.2.j will be voided]

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

3. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:
  - 63.3130(a) notification and reports verifying compliance
  - 63.3130(b) information provided by suppliers or manufacturers
  - 63.3130(c)(1) required information for each coating used
  - 63.3130(c)(2) required information for each thinner used
  - 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
  - 63.3130(c)(6)(i) and (ii) average mass organic HAP content
  - 63.3130(d) through (h) required overall records that should be maintained
  - 63.3130(m) transfer efficiency records
  - 63.3130(n) record of the work practice plan

### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. through 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 629 tons/yr.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

3. For only those floor cleaning and body wiping solvents subject to OAC rule 3745-21-07, the permittee shall submit deviation reports that identify all periods of time during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the date of occurrence.

[Note: After the revision to OAC rule 21-07(G) is approved into the Ohio SIP, section IV.3 will be voided]

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

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

#### **V. Testing Requirements**

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

Emission Limitation-

The OC emissions from this emissions unit shall not exceed 629 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the solvents.

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

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Prime Coat (ELPO) line with oven (K029)  
**Activity Description:** Prime Coat (ELPO) line with oven

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K029- electrocoating dip tank w/ natural gas-fired oven (ELPO) controlled with a thermal oxidizer	OAC rule 3745-31-05(A)(3) PTI #08-3527	<p>The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 12.21 lbs/hr, 28.34 tons/yr, based on a rolling, 12-month summation, not including cleanup materials.</p> <p>[Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]</p> <p>See Sections A.I.2.a through c.</p> <p>The following limits are from natural gas combustion:</p> <p>The nitrogen oxides (NO<sub>x</sub>) emissions from this emissions unit shall not exceed 25.6 tons/yr, based on a rolling, 12-month summation.</p> <p>The carbon oxide (CO) emissions from this emissions unit shall not exceed 21.50 tons/yr based on a rolling, 12-month summation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(E) and 3745-21-08(B), 40 CFR Part 63, Subpart A and Subpart IIII.</p>

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-09(C)(1)(a)(i)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06 (E)	exempt, pursuant to OAC rule 3745-18-06(C) (See A.I.2.d.)
	OAC rules 3745-21-08(B)	See A.I.2.e.
	OAC rule 3745-17-11	See A.I.2.f.
	OAC rule 3745-17-07(A)	See A.I.2.g.
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3092(a)(1) and (2)
		1.0 percent by weight of any organic HAP; and 0.10 percent by weight of any organic HAP which is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4).
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

**2. Additional Terms and Conditions**

- 2.a** The VOC content of the coatings employed in the electrocoating (ELPO) dip tank of this emissions unit shall comply with the VOC content limitation of 0.74 lb/gallon of coating, as a monthly, volume-weighted average, excluding water and exempt solvents, before the application of emission controls.
- 2.b** The coatings employed in the electrocoating (ELPO) dip tank of this emissions unit shall comply with the limitation of 0.10 kg VOC/liter of applied coating solids, or 0.82 pound VOC/gallon of applied coating solids, as a monthly, volume-weighted average, before the application of emission controls.
- 2.c** The VOC emissions from the cure oven of this emissions unit shall be controlled by a thermal oxidizer. The thermal oxidizer shall operate at a minimum VOC destruction efficiency of 90%, by weight. The overall VOC control efficiency for this emissions unit shall be no less than 63%, by weight.
- 2.d** There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for equipment associated with this emissions unit that are not considered "fuel burning equipment" because the process weight rate is less than 1,000 pounds/hour.
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 08-3527.

## 2. Additional Terms and Conditions (continued)

- 2.f** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- 2.g** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

## II. Operational Restrictions

1. All VOC emissions from the oven shall be captured and contained for discharge through the thermal oxidizer.  
[Authority for Term: OAC rule 3745-77-07(A)(1)]
2. The maximum natural gas usage for the oven associated with this emissions unit shall not exceed 512 million cubic feet, based upon a rolling, 12-month summation of the monthly natural gas usage rates.  
[Authority for Term: OAC rule 3745-77-07(A)(1)]
3. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:  
  
63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. through 7. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.  
[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.  
[Authority for Term: OAC rule 3745-77-07(A)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month for the ELPO dip tank:
- a. The name and identification of each material added to the dip tank.
  - b. The VOC content, in pounds per gallon (including water and exempt solvents) of each material added to the tank.
  - c. The volume of each coating material added to the dip tank (including water and exempt solvents), in gallons.
  - d. The volume percent (as a decimal fraction) solids of each coating material added to the dip tank.
  - e. The volume percent (as a decimal fraction) of water and exempt solvents of each coating material added to the dip tank.
  - f. The calculated volume-weighted average VOC content, lb VOC/gallon, of the combination of materials added to the dip tank, excluding water and exempt solvents (see Section A.V.1.a).
  - g. The calculated, pounds VOC per gallon of coating applied solids (see Section A.V.1.b).
  - h. The calculated, controlled, VOC emission rate, in tons (see Section A.V.1.d).
  - i. The number of hours of operation.
  - j. The average hourly VOC emission rate, in pounds/hr (average) .
  - k. A log or record of the downtime for the capture (collection system), control device and monitoring equipment when the associated emissions unit was in operation.
  - l. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.

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

4. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. The total amount of natural gas usage (million cubic feet).
  - b. The rolling, 12-month summation of the monthly natural gas usage rates, in million cubic feet.

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

5. The permittee shall operate and maintain continuous temperatures monitors and recorders that measure and record the combustion temperature within each of the thermal oxidizers when the emissions unit is in operation. For each thermal oxidizer, the permittee shall utilize a continuous strip chart recorder. If the strip chart malfunctions, the permittee shall utilize a computer system that records the temperatures every second and at the end of the day prints out the high, low and average temperatures for the day. Units shall be in degrees Fahrenheit. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameters and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturers 'recommendations, with any modifications deemed necessary by the permittee.

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

### III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall collect and record the following information for each day for the thermal oxidizers:
  - a. A log of downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
  - b. All 3-hour blocks of time during which the average combustion temperature within any of the thermal oxidizers, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature measured during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

7. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

- 63.3130(a) notification and reports verifying compliance
- 63.3130(b) information provided by suppliers or manufacturers
- 63.3130(c)(1) required information for each coating used
- 63.3130(c)(2) required information for each thinner used
- 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
- 63.3130(c)(6)(i) and (ii) average mass organic HAP content
- 63.3130(d) through (h) required overall records that should be maintained
- 63.3130(m) transfer efficiency records
- 63.3130(n) record of the work practice plan

### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-2506, issued on 03/11/2003: A.IV.2. through 6. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying coating material [i.e., for VOC content (0.74 lb VOC/gallon of coating, excluding water and exempt solvents)]. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly deviation (excursion) reports that include the following:
  - a. an identification of all 3-hour blocks of time during which the average combustion temperature was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent performance test that the emissions unit was in compliance;
  - b. an identification of all exceedances of the rolling, 12-month gas usage restriction of 512 million cubic feet; and
  - c. an identification of all exceedances of the rolling, 12-month VOC emission limitation of 28.34 tons.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any noncomplying coating material [i.e., for VOC emission rate (0.82 lb VOC/gallon of applied coating solids)]. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

5. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

6. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

#### **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

- 1.a** Emission Limitation-  
The VOC content shall not exceed 0.74 lb VOC/gallon of coating, excluding water and exempt solvents, before the application of emission controls

Applicable Compliance Method-

The calculated monthly, volume-weighted average VOC content of the combination of materials added to the dip tank, in lbs/gallon, excluding water and exempt solvents, shall be determined in accordance with the following:

- i. Sum the volumes, in gallons, of all the individual materials added to the dip tank, from Section A.III.2.c.
- ii. Sum (b x c), from Section A.III.2, for all the individual materials added to the dip tank to determine total VOC, in pounds.
- iii. Sum (c x e), from Section A.III.2, for all the individual materials added to the dip tank to determine total volume of water and exempt solvents, in gallons.
- iv. Subtract V.1.a.iii from V.1.a.i to determine total volume of materials added to the dip tank, in gallons (excluding water and exempt solvents).
- v. Divide V.1.a.ii by V.1.a.iv to determine the monthly, volume-weighted average VOC content of the combination of materials added to the dip tank, in lbs/gallon, excluding water and exempt solvents.

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

- 1.b** Emission Limitation-  
The VOC content shall not exceed 0.82 lb VOC/gallon of applied coating solids, before the application of emission control.

Applicable Compliance Method-

The calculated monthly, volume-weighted average VOC emission rate of the combination of materials added to the dip tank, in lbs/gallon of applied coating solids shall be determined in accordance with the following:

- i. Determine the total monthly solids volume, in gallons, for all the individual materials added to the dip tank by summing (c x d), from Section A.III.3, for the month for all materials added;
- ii. Determine the total monthly VOC emissions from all the materials added to the dip tank, in pounds, as follows:
  - (a) Sum (b x c) for all the materials added to the dip tank, from Section A.III.3.
- iii. Divide V.1.b.ii by V.1.b.i to determine the monthly, volume-weighted average VOC emission rate, in pounds per gallon of applied solids of the combination of materials added to the dip tank.

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

- 1.c** Emission Limitation-  
The VOC emissions from this emissions unit shall not exceed 12.21 lbs/hr.

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission rate shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

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

**V. Testing Requirements (continued)**

- 1.d** Emission Limitation-  
The VOC emissions from this emissions unit shall not exceed 28.34 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method-  
Compliance shall be determined as follows:

- i. Determine the total monthly VOC emissions from all the materials added to the dip tank, in pounds, as follows:
  - (a) Sum (b x c) for all the materials added to the dip tank, from Section A.III.3.
  - (b) Determine the monthly VOC emissions, in tons, by dividing the VOC emission rate for the calendar month by 2000 lbs/ton.
- ii. Multiply the total monthly VOC emissions by (1 - the overall control efficiency for the control equipment as determined during the most recent emission testing that demonstrated the emissions unit was in compliance).
- iii. Determine the rolling, 12-month summation of the monthly VOC emission rates, in tons, by adding the monthly VOC emission rates for the previous 11 calendar months and the VOC emission rate for the current calendar month.

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

- 1.e** Emission Limitations-  
The NO<sub>x</sub> emissions from this emissions unit shall not exceed 25.6 tons/y; The CO emissions from this emissions unit shall not exceed 21.50 tons/yr, as rolling, 12-month summations

Applicable Compliance Method-  
The annual emission limitations were determined by multiplying the maximum allowable natural gas consumption for each rolling, 12-month period of 512 million cu.ft. by the AP-42 emission factors of 100 lbs NO<sub>x</sub>/mm cu.ft. and 84 lbs CO/mm cu.ft. and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum allowable natural gas consumption restriction for each rolling, 12-month period, compliance shall also be shown with the rolling, 12-month emission limitations for NO<sub>x</sub> and CO.

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

- 1.f** Emission Limitations-  
90% destruction efficiency for VOC, by weight  
63% overall control efficiency, for VOC, by weight

Applicable Compliance Method-  
The permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with the methods and procedures outlined in Section A.V.3. of this permit.

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

- 2.** In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If the permittee determines that 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

## V. Testing Requirements (continued)

3. 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 12 months prior to permit renewal.
  - b. The emission testing shall be conducted to demonstrate compliance with the thermal oxidizer destruction efficiency requirement, the overall control efficiency requirement, and the lbs/hr VOC emission rate.
  - c. The test(s) shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - d. The capture efficiency shall be determined in accordance with the following:
    - i. Demonstrate that the system is under negative pressure at all natural draft openings (NDOs) identified as the entrance to the dip tank, the pendulum conveyor opening from the floor of the enclosure which permits conveyor return to the dip tank entrance, and the two oven exits. The demonstration shall be through the use of smoke tubes.
    - ii. Measure the VOC emissions from the oven exhausts (north and south inlets to thermal oxidizer), the outlet from the thermal oxidizer, and the outlet from the uncontrolled stacks associated with this emissions unit (the rinse enclosure ambient exhausts). The VOC measurements shall be in accordance with the test methods and procedures specified in Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.
    - iii. Calculate capture efficiency as follows: sum the total mass VOC emission rates measured from the north and south oven exhausts, divide by the sum of the total mass VOC emission rates measured from the dip tank ambient exhaust, the rinse enclosure ambient exhausts, and the north and south oven exhaust, and multiply by 100% as represented by the following equation:  
$$\frac{(\text{VOCm NO exhaust} + \text{VOCm SO exhaust})}{(\text{VOCm NO exhaust} + \text{VOCm SO exhaust} + \text{VOCm DTexhaust} + \text{VOCm RE})} \times 100\%$$
  
where: VOCm is VOC mass, i.e. lbs/hr, NO is North Oven, SO is South Oven, DT is dip tank, RE is rinse enclosure
  - e. Determine the thermal oxidizer VOC destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) in accordance with the test methods and procedures specified in Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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

**V. Testing Requirements (continued)**

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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K029- electrocoating dip tank w/ natural gas-fired oven (ELPO) controlled with a thermal oxidizer	OAC rule 3745-17-11(A)(1)(h)	This emissions unit employ surface coating processes that apply only dip coatings. It is therefore. exempt from the requirements of OAC rule 3745-17-11(C).

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Windshield Glass System (K031)  
**Activity Description:** Windshield glass installation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K031- windshield glass system	OAC rule 3745-31-05(A)(3) PTI # 08-3719	The organic compound (OC) emissions from this emissions unit shall not exceed 117.8 lbs/day, 16.53 tons/yr* , excluding cleanup.  See.A.I.2.a.  * based on a rolling, 12-month summation
	OAC rule 3745-21-07(G)(9)(g)  40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g), 40 CFR Part 63, Subpart A and Subpart IIII.  See Section A.I.2.a.  See 40 CFR Part 63.3091(b)
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	1.10 pounds of HAPs per gallon of coating solids deposited  63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

## 2. Additional Terms and Conditions

**2.a** The maximum VOC content of each coating material employed in this emissions unit shall not exceed the following:

- i. 7.3 lbs VOC/gallon of coating, excluding water and exempt solvents, for the clear prime;
- ii. 5.1 lbs VOC/gallon of coating, excluding water and exempt solvents, for the black prime; and
- iii. 0.08 lb VOC/gallon of coating, excluding water and exempt solvents, for the urethane sealer.

On the date that the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds, the provisions of paragraph (G)(9)(g) of Rule 3745-21-07 will be retained in a new paragraph (M)(5)(e).

## II. Operational Restrictions

1. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in #08-3719, issued on 03/25/1998: A.III.2 and 3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall collect and record the following information each month for this emissions unit:

- a. The company identification and type (i.e., clear prime, black prime, or urethane sealer) of each coating employed.
- b. The number of gallons, excluding water and exempt solvents, of each coating employed.
- c. The VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon, as applied.
- d. The total VOC emission rate from all the coatings employed (summation of (b x c) for all coatings, divided by 2000), in tons.
- e. The rolling, 12-month summation of the monthly VOC emission rates, in tons.
- f. The total number of days the emissions unit was in operation.
- g. The average daily VOC emission rate for all the coatings employed, i.e., (d)/(f), in pounds per day (average).

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

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:
  - 63.3130(a) notification and reports verifying compliance
  - 63.3130(b) information provided by suppliers or manufacturers
  - 63.3130(c)(1) required information for each coating used
  - 63.3130(c)(2) required information for each thinner used
  - 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
  - 63.3130(c)(6)(i) and (ii) average mass organic HAP content
  - 63.3130(d) through (h) required overall records that should be maintained
  - 63.3130(m) transfer efficiency records
  - 63.3130(n) record of the work practice plan

### IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #08-3719, issued on 03/25/1998: A.IV.2. through 5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 16.53 tons and the daily OC emission limitation of 117.8 pounds.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of each monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

4. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

5. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

### V. Testing Requirements

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

## V. Testing Requirements (continued)

### 1.a Emission Limitation-

The OC emissions from this emissions unit shall not exceed 117.8 lbs/day, excluding cleanup.

#### Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

### 1.b Emission Limitation-

The OC emissions from this emissions unit shall not exceed 16.53 tons/yr (excluding cleanup), as a rolling, 12-month summation

#### Applicable Compliance Methods-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

### 1.c VOC content Limitations:

The VOC content shall not exceed 7.3 lbs VOC/gallon of coating (clear prime)

The VOC content shall not exceed 5.1 lbs VOC/gallon of coating (black prime)

The VOC content shall not exceed 0.08 lbs VOC/gallon of coating (urethane sealer)

#### Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC content limitations above based on the record keeping requirements specified in Section A.III.1 of this permit.

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

2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If the permittee determines that 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Maintenance Paint Booth (K034)  
**Activity Description:** Maintenance painting activities

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K034- maintenance paint booth for metal and non-metal parts	OAC rule 3745-31-05(A)(3) PTI 08-3893	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 7 lbs/hr, 40 lbs/day, and 4.20 tons/yr (from all the coatings used for the metal and non-metal parts, combined) [See A.1.2.a and b.)
		[Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]
		The particulate emissions (PE) from this emissions unit shall not exceed 2.41 tons/yr.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(i), 3745-17-07(A), 3745-17-11(B) and 3745-21-07(G)(2). on the days when coating non-metal parts:
		The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The daily limitation specified by this rule is as stringent as the daily limitation established pursuant to OAC rule 3745-31-05(A)(3).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B)	The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hr. See A.1.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(2)(e)(i)	On the days when coating metal parts the maximum daily coating usage for this emissions unit shall not exceed 8 gallons of coating.

## 2. Additional Terms and Conditions

- 2.a The hourly VOC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b All the coatings employed in this emissions unit will be considered to be photochemically reactive materials.
- 2.c This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.

## II. Operational Restrictions

None

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The company identification for each coating employed.
  - b. The volume, in gallons, of each coating employed.
  - c. The total volume, in gallons, of all the coatings employed. (It will be assumed by the permittee that all coatings employed are employed for metal parts.)
  - d. The VOC content of each coating employed, in pounds per gallon.
  - e. The total VOC emission rate for all the coatings employed [summation of (b x d) for all coatings], in pounds

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

- 2. The permittee shall document whether or not the paint overspray filter was in service when the paint spraying application associated with this emissions unit is in operation.

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

#### IV. Reporting Requirements

1. For the coating of metal parts, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the allowable maximum daily coating usage limitation of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings used for the metal and non-metal parts, combined, exceeded 40 pounds, and the actual VOC emission rate for each such day.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the paint overspray filter not in service when the paint spraying application associated with this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

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

4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

#### V. Testing Requirements

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

- 1.a Emissions Limitation-

The VOC emissions from this emissions unit shall not exceed 7 lbs/hour (for the coatings used for metal and non-metal parts)

Applicable Compliance Method-

Compliance may be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum hourly coating usage rate (gallons/hr).

If required, compliance with the hourly allowable VOC emission limitation shall be demonstrated in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

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

- 1.b Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 40 lbs/day (from all the coatings used for the metal and non-metal parts, combined)

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

## V. Testing Requirements (continued)

**1.c** Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 4.20 tons/yr.

Applicable Compliance Method-

As long as compliance with the daily VOC emission limitation is maintained, compliance with the annual VOC emission limitation shall be assumed (the annual allowable VOC emission limitation is less than the annual potential to emit for VOC). The annual potential to emit for VOC is determined by multiplying the daily limitation by 365 days/yr, and then dividing by 2000 lbs/ton).

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

**1.d** Emission Limitation-

On the days when coating metal parts the maximum daily coating usage for this emissions unit shall not exceed 8 gallons of coating.

Applicable compliance Method-

Compliance shall be based upon the record keeping specified in Section A.III.1 of this permit.

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

**1.e** Emission Limitation -

The PE from this emissions unit shall not exceed 0.551 lb/hr.

Applicable Compliance Method -

The 0.551 lb/hr limitation was developed from Figure II utilizing a process weight of xx tons per hour.

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

**1.f** Emission Limitation -

The PE from this emissions unit shall not exceed 2.41 tons/yr.

Applicable Compliance Method -

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

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

**1.g** Emission Limitation-

The visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

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

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials employed in this emissions.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K034- maintenance paint booth for metal and non-metal parts	OAC rule 3745-17-11(A)(1)(k)	This emissions unit employ surface coating processes that employ hand-held cup spray guns. It is therefore. exempt from the requirements of OAC rule 3745-17-11(C).

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Hinge Sealer (K035)  
**Activity Description:** Application of sealer to door hinges of vehicle

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K035- Hinge Sealer	OAC rule 3745-31-05(A)(3) PTI 08-3917	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 64.0 lbs/day and 9.0 tons/yr based on a rolling, 12-month summation.  The VOC content shall not exceed 3.23 lbs VOC/gallon of coating, excluding water and exempt solvents.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart A and Subpart IIII.
	OAC rule 3745-21-09(U)(1)(d)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3091(c)  0.01 pounds of HAPs per pound of adhesive and sealer material
	40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

##### 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each sealer material, as applied.
  - b. The VOC content of each sealer material (in pounds/gallon, excluding water and exempt solvents), as applied.
  - c. The number of gallons (excluding water and exempt solvents) of each sealer material employed.
  - d. The total VOC emissions from all the sealer materials employed [summation of (b x c) for all sealer materials], in pounds.
  - e. The rolling, 12-month summation of the VOC emission rate, in tons.
  - f. The total number of days the emission unit was in operation.
  - g. The average daily VOC emission rate for all the sealer materials employed, i.e., (d)/(f), in pounds per day.

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

2. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a) notification and reports verifying compliance  
63.3130(b) information provided by suppliers or manufacturers  
63.3130(c)(1) required information for each coating used  
63.3130(c)(2) required information for each thinner used  
63.3130(c)(4) and (5) record of the of the organic HAP emission rates  
63.3130(c)(6)(i) and (ii) average mass organic HAP content  
63.3130(d) through (h) required overall records that should be maintained  
63.3130(m) transfer efficiency records  
63.3130(n) record of the work practice plan

## IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying sealer materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

#### IV. Reporting Requirements (continued)

2. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly deviation (excursion) reports that include the following:

- a. All exceedances of the rolling, 12-month VOC emission limitation of 9.0 tons.
- b. All exceedances of the daily VOC emission limitation of 64.0 pounds.

The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

4. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports

#### V. Testing Requirements

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

- 1.a Emission limitation-  
The VOC emissions from this emissions unit shall not exceed 64.0 lbs/day

Applicable Compliance Method-  
Compliance shall based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

- 1.b Emission limitation-  
The VOC emissions from this emissions unit shall not exceed 9.0 ton/yr, as a rolling, 12-month summation.

Applicable Compliance Method-  
Compliance shall based upon the record keeping requirements as specified in Section A.III.1 of this permit.

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

- 1.c Emission limitation-  
The VOC content shall not exceed 3.23 lbs VOC/gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method-  
Compliance shall based upon the record keeping requirements specified in Section A.III.1 of this permit. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If the permittee determines that 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

Facility Name: **General Motors Corporation - Moraine Assembly**  
Facility ID: **08-57-10-1349**  
Emissions Unit: **Hinge Sealer (K035)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

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

**None**

**IV. Reporting Requirements**

**None**

**V. Testing Requirements**

**None**

**VI. Miscellaneous Requirements**

**None**

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**THIS IS THE LAST PAGE OF THE PERMIT**

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# Statement of Basis For Title V Permit

Part I - General	
Company Name	GM Corporation- Moraine Assembly
Premise Number	08-57-10-1349
What makes this facility a Title V facility?	Volatile organic compound (VOC), nitrogen oxide (NOx), and hazardous air pollutants (HAPs)
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Y
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	The 'superceding' language was revised with the 'streamlining' term that was worked out with USEPA. The operation restrictions on production days and production rate were increased from 300 days to 310 days and 348,000 vehicles to 384,400 vehicles respectively see PTI 08-2506 issued 03/11/2003. A Title V minor modification was submitted on 05/12/2006 and consequently approved by OEPA. The minor modification was issued due to requested revisions to the TV T&Cs for emissions unit K023. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Truck (40 CFR Part 63, Subpart IIII), which was promulgated on April 26, 2004 and has the first compliance date of April 26, 2007. CAM was added to K023 for the VOC limit.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1 and 2.	N	Y	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 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Truck (40 CFR Part 63, Subpart IIII). The following emission units are subject to the aforementioned requirements: K022, K023, K025, K027, K028, K029, K031 and K035.  The permittee is subject to the general requirements specified in 40 CFR Part 63
A.4, 5, and 6.	31-05(C)	PTI 08-2506	The permittee monitor and maintain monthly records of the annual number of production days of operation and annual production rate based upon a rolling 12-month summations. The permittee shall submit quarterly deviation reports of any exceedences of the rolling , 12 -month days of operation and production rate.

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												

B001	0.02 lb PE/mmBtu	17-10 (B)(1)	N	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>OR - The permittee is limited to burning natural gas in this emissions unit.</p> <p>ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
	17.0 tons PE/yr particulate as a rolling 12-month summation	N	PTI 08-2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>OR - The Permittee shall comply with the rolling , 12-month natural gas limitation. CAM is not applicable.</p> <p>ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
	71.40 tons CO/yr as a rolling 12-month summation	N	PTI 08-2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>OR - The Permittee shall comply with the rolling , 12-month natural gas limitation. CAM is not applicable.</p> <p>ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>

	4.68 tons VOC/yr as a rolling 12-month summation	N	PTI 08-2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR - The Permittee shall comply with the rolling , 12-month natural gas limitation. CAM is not applicable.  ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	135.58 tons NOx/yr as a rolling 12-month summation	N	PTI 08-2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR - The Permittee shall comply with the rolling , 12-month natural gas limitation. CAM is not applicable.  ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	20% opacity as a 6-minute average	17-07(A)		N	N	N	Y	N	N	Y	N	Y	N	N	OR - Permittee is limited to burning natural gas to minimize particulate emissions. CAM is not applicable.  ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
G001	Stage I vapor control - 90% control for VOC, submerged fill	21-09(R)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR - The permittee shall comply with the restrictions for the Stage I vapor control system  ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	Stage II vapor recovery 95% efficiency for VOCs	21-09(DDD)		N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>OR - The permittee shall comply with the restrictions for the Stage II vapor control system</p> <p>ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Stage II static leak test and dynamic blockage test is required.</p> <p>Misc. Stage II vapor recovery shall be operated and maintained according to in accordance with appropriate California Air Resources Board (CARB) Orders.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
	4.98 tons OC/yr	N	PTI 08-3719	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	<p>OR - Permittee is required to employ Stage I and II vapor control systems.</p> <p>ET - Permittee will demonstrate compliance through monitoring and record keeping requirements.</p> <p>Misc. Stage II vapor recovery shall be operated and maintained according to in accordance with appropriate California Air Resources Board (CARB) Orders.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>
K020	8.3 lbs OC/hr	N	PTI 08-2506	N	N	N	Y	N	N	Y	N	Y	N	N	<p>The hourly limitation is reflective of the potential to emit for this emissions unit, based upon the maximum hourly number of units multiplied by a company derived OC emission factor. Therefore it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.</p> <p>St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.</p>

	133.4 lbs OC/day	N	PTI 08- 2506	N	N	N	Y	N	N	Y	N	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	20.01 tons OC/yr as a rolling 12- month summation	N	PTI 08- 2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K022	2.2 lbs VOC/hr	N	PTI 08- 2506	N	N	Y	N	N	Y	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit, based upon the maximum hourly coating usage rate by the maximum VOC content of all of the coatings. Therefore it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	34.8 lbs VOC/day	N	PTI 08- 2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	5.22 tons VOC/ year	N	PTI 08- 2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

K023	0.99 Kg VOC/liter of coating solids applied or 8.24 lbs VOC/gal of solids applied	N	PTI 08- 2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	4913.76 lbs VOC/Day	N	PTI 08- 2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	737.6 tons VOC/yr as a rolling 12- month summation	N	PTI 08- 2506	N	Y	Y	Y	N	Y	Y	Y	Y	N	N	OR - The permittee shall comply with the rolling , 12-month annual VOC usage. The average temperature in each thermal oxidizer shall not be less than 50 degrees Fahrenheit below the average temperature during the last stack test. All booths shall operate as permanent total enclosures.  The permittee shall demonstrate compliance with overall capture efficiency, the fume concentrator removal efficiency, the thermal oxidizers destruction efficiencies, the total overall mass emission limitation for VOC, and the VOC content limitation.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	19.71 tons particulate/year	N	Y	N	N	Y	Y	N	Y	Y	Y	Y	N	N	The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760 and then dividing by 2000. Therefore provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	4.5 lbs particulate/hr	17-11(B)	N	N	N	Y	N	N	N	Y	N	Y	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit based on the worst case emissions rate. Therefore it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	20% opacity as a 6-minute average	17-07(A)	N	N	N	Y	Y	N	N	Y	N	Y	N	N	The permittee shall operate the water wash when this emissions unit is in operation.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K025	88.81 lbs VOC/Day	N	PTI 08-2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	13.32 tons VOC/yr	N	PTI 08-2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	3.10 tons particulate/year	N	Y	N	N	N	Y	N	N	Y	N	Y	N	N	The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760 and then dividing by 2000. Therefore provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI..
	4.8 lbs VOC/gallon of coating	21-09(C)(1)	N	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	0.71 lb particulate/hr	17-11(B)	N	N	N	N	Y	N	N	Y	N	Y	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit based on the worst case emissions rate. Therefore it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	20% opacity as a 6-minute average	17-07(A)	N	N	N	N	Y	N	N	Y	N	Y	N	N	St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K027	17.0 VOC lbs/hr	N	PTI 08-2506	N	N	N	Y	N	N	Y	N	Y	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit based on the worst case emissions rate. Therefore it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	37.58 tons VOC/yr as a rolling 12-month summation	N	PTI 08-2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	3.0 lbs VOC/gallon of coating	21-09(U)(1)(i)	N	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K028	629.0 tons VOC/yr as a rolling 12-month summation	N	PTI 08-2506	N	N	Y	Y	N	Y	Y	Y	Y	N	N	Use of photochemically reactive materials is prohibited, monthly record will be kept of each material employed, and deviation reports submitted within 30 days of the date of occurrence.  ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K029	12.21 lbs VOC/hr	N	PTI 08-3527	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	28.34 tons VOC/yr as a rolling 12-month summation	N	PTI 08-3527	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	25.6 tons Nox/yr as a rolling 12- month summation	N	PTI 08- 3527	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	21.50 tons CO/yr as a rolling 12- month summation	N	PTI 08- 3527	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	0.74 lb VOC/gallon	N	PTI 08- 3527	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	0.82 lb VOC/gallon	N	PTI 08- 3527	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K031	117.8 lbs VOC/hr	N	PTI 08- 3719	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.

	16.53 tons VOC/yr as a rolling 12- month summation	N	PTI 08- 3719	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
	7.3 lbs VOC/gallon of coating (clear prime)  5.1 lbs VOC/gallon of coating (black prime)  0.08 lbs VOC/gallon of coating (urethane sealer)	21- 07(G)(9)( g)	PTI 08- 3719	N	N	Y	Y	N	Y	Y	Y	Y	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.  St- The streamlined term is equal or more stringent than the monitoring, record keeping and reporting requirements specified in the permit to install because these terms were not included in the original PTI and were developed after issuance of the PTI.
K034	less than or equal to 8 gallons of coating usage	21- 09(U)(2)( e)(i)	PTI 08- 3893	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.
	7 lbs VOC/hr 40 lbs VOC/day	N	PTI 08- 3893	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.
	4.20 tons VOC/yr	N	PTI 08- 3893	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.
	0.551 lb/hr particulate emissions	17-11(B)	N	N	N	N	N	N	N	N	N	N	N	N	The hourly limitation is reflective of the potential to emit for this emissions unit based on the worst case emissions rate. Therefore it is not necessary to develop monitoring, record keeping, or reporting requirements to ensure compliance with this limit.

	2.41 tons PE/yr	N	PTI 08-3893	N	N	N	N	N	N	N	N	N	N	N	The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760 and then dividing by 2000. Therefore provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
K035	64.0 lbs VOC/day	N	PTI 08-3917	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.
	3.23 lbs VOC/gallon of coating excluding water and exempt solvents	N	PTI 08-3917	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.
	9.0 tons VOC/yr	N	PTI 08-3917	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee will demonstrate compliance through monitoring and record keeping requirements. Emissions testing is not required.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

**C Instructions for Part III:**

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

**C** **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.