

# Statement of Basis For Title V Permit

Company Name	DaimlerChrysler, Jeep Parkway		
Premise Number	0448010413		
Number of Non-insignificant Emissions Units	21		
What makes this facility a Title V facility?	CO, NOx, SO2, VOC & HAPs		
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	yes		

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	

**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.

C     If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B001 and B002, Boilers #1 & #2, each 69.8 MMBtus natural gas and/or number two fuel oil fired.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	0.020 lb particulate matter per MM Btus.	17-10 (B)(1)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement. ET - PTE is 4.4 tpy when burning fuel oil ^ stack testing will not be required as a demonstration of compliance.
	1.5 lbs of SO2 per MM Btus.	18-54 (R)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	See A.II.3	31-05 (A)(3)		Y	Y	Y	Y	Y	N	Basis - BAT & PSD limitations established in PTI 04-247, as issued November 16, 1988.  OR - Restrictions on quantity of each fuel for all boilers combined.  ET - PTEs (per emissions unit for B001 & B002): CO = 25 tpy, NOx = 44 tpy, PM = 4.4 tpy, SO2 = 160 tpy & VOC = 1.6 tpy. Fuel analysis is required for SO2. Actual 1997 NOx = 6.7 tpy (B001) & 5.9 tpy (B002) ^ stack testing will not be required as a demonstration of compliance.
	See A.I.2.a.	31-05 (D)		Y	Y	Y	Y	Y	N	Basis - Netting limitations established in PTI 04-247, as issued November 16, 1988.  OR - Restrictions on quantity of each fuel for all boilers combined.
B013, Boiler #11, 82.2 MMBtus natural gas and/or number two fuel oil fired.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	0.020 lb particulate matter per MM Btus.	17-10 (B)(1)		Y	Y	Y	Y	Y	N	OR -Inherently clean fuel requirement.  ET - PTE is 5.1 tpy when burning fuel oil ^ stack testing will not be required as demonstration of compliance.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B013, Boiler #11, 82.2 MMBtus natural gas and/or number two fuel oil fired, cont'd.	1.6 lbs of SO2 per MM Btus.	18-06- (D)		Y	Y	Y	Y	Y	N	OR - Natural gas is inherently low in sulfur content ^ stack testing will not be required at this time.
	0.145 lb NOx per MM Btus	23-06 (B)		Y	Y	Y	Y	Y	N	OR -Inherently clean fuel requirement.
	0% opacity as a six- minute avg, 0.52 lb SO2 per MM Btus for #2 F.O., 0.6 lb SO2 per MM BTU for gas and see A.II.3.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	Basis - BAT & PSD limitations established in PTI 04-247, as issued November 16, 1988.  OR - Restrictions on quantity of each fuel for all boilers combined.  ET - Stack testing 11/14/90 yielded CO = 0.13 lb/MMBtus & NOx = 0.08 lb/MMBtus. PTEs: CO = 47 tpy, NOx = 29 tpy, PM = 5.1 tpy, SO2 = 190 tpy & VOC = 1.9 tpy. Fuel analysis is required for SO2. Actual 1997 NOx = 19 tpy ^ CO = 31 tpy & stack testing will not be required as a demonstration of compliance.
	See A.I.2.c.	31-05 (D)		Y	Y	Y	Y	Y	N	Basis - Netting limitations established in PTI 04-247, as issued November 16, 1988.  OR - Restrictions on quantity of each fuel for all boilers combined.
B014 & B015, Boilers #12 & #13, each 84.0 MMBtus coal fired with fabric filter.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Baghouse operation required.
	0.21 lb particulate matter per MM Btus.	17-10 (C)(1)		Y	Y	Y	Y	Y	N	OR - Baghouse operation required.  ET - Historical records indicate <25 tpy actual emissions ^ stack testing at regular intervals will not be required at this time.
	1.6 lbs of SO2 per MM Btus.	18-54 (A)		Y	Y	Y	Y	Y	N	OR - This restriction forces compliance ^ stack testing will not be required at this time.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
B014 & B015, Boilers #12 & #13, each 84.0 MMBtus coal fired with fabric filter, cont'd.	5% opacity as a six-minute avg, 0.06 lb particulate per MM Btus, 1.2 lb SO2 per MM BTU and see A.II.3.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	<p>Basis - BAT &amp; PSD limitations established in PTI 04-247, as issued November 16, 1988.</p> <p>OR - Restrictions on quantity of each fuel for all boilers combined. CAM is not applicable.</p> <p>ET - B014 stack testing 1/28/98 yielded CO = 0.13 lb/MMBtus, NOx = 0.60 lb/MMBtus, PM = 0.0019 lb/MMBtus &amp; SO2 = 0.90 lb/MMBtu. PTEs: CO = 48 tpy, NOx = 220 tpy, PM = 0.7 tpy, SO2 = 440 tpy &amp; VOC = 0.8 tpy.. Record keeping is required for PM (baghouse operation). Fuel analysis is required for SO2. Actual 1997 NOx = 22 tpy ^ CO = 5 tpy &amp; stack testing will not be required as a demonstration of compliance. B015 stack testing 2/5/98 yielded CO = 0.27 lb/MMBtus, NOx = 0.49 lb/MMBtus, PM = 0.0023 lb/MMBTus &amp; SO2 = 0.88 lb/MMBtus. PTEs: CO = 99 tpy, NOx = 180 tpy, PM = 0.8 tpy, SO2 = 440 tpy &amp; VOC = 0.8 tpy. Record keeping is required for PM (baghouse operation). Fuel analysis is required for SO2. Actual 1997 NOx = 0 tpy ^ CO = 0 tpy &amp; stack testing will not be required as a demonstration of compliance.</p>
	See A.I.2.c.	31-05 (D)		Y	Y	Y	Y	Y	N	<p>Basis - Netting limitations established in PTI 04-247, as issued November 16, 1988.</p> <p>OR - Restrictions on quantity of each fuel for all boilers combined.</p>
F003, Paved roadways and parking areas	No visible particulate emissions except for 6 minutes during any 60-minute period.	17-07 (B)(4)		N	Y	Y	Y	Y	N	
	Reasonably available control measures.	17-08 (B), (B)(8), (B)(9)		N	Y	Y	Y	Y	N	

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
F003, Unpaved roadways and parking areas.	No visible particulate emissions except for 13 minutes during any 60-minute period.	17-07 (B)(5)		N	Y	Y	Y	Y	N	
	Reasonabl y available control measures.	17-08 (B), (B)(2)		N	Y	Y	Y	Y	N	
G001, gasoline storage tank(s): one 6,000 gallons, and two 20,000 gallons undergrou nd.	Stage I vapor control - 90% control efficiency for VOCs, submerged fill.	21-09 (R)		N	Y	Y	Y	Y	N	
K004, Automobi le final repair topcoat coating line with water wash collector.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Use of a waterwash system.
	0.551 lb of particulate s per hour.	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - Use of a waterwash system.  ET - Actual 1997 PM = 0.09 tpy ^ stack testing will not be required as a demonstration of compliance.
	15.1 lb of VOC per gallon of applied solids.	21-09 (C)(1) (c)		N	Y	Y	Y	Y	N	

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
	see Section A.I.2.a.	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - BAT established by PTI 04-585 as issued June 7, 1991.
K004, Automobile final repair topcoat coating line with water wash collector; cont.	see Section A.I.2.b.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-585 as issued June 7, 1991.
K004, 11.5 MM Btus gas direct fired bake oven.	SO2 exemption	18-06 (A)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
K007, Automobile E-Coat prime coating line.	1.2 lbs of VOC per gallon of coating.	21-09 (C)(1) (a)(i)		N	Y	Y	Y	Y	N	
	see Section A.I.2.a.	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - BAT established by PTI 04-585 as issued June 7, 1991.
	see Section A.I.2.b.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-585 as issued June 7, 1991.
K007, 32.9 MM Btus gas indirect fired bake oven.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
	0.020 lb particulate matter per MMBtus.	17-10 (B)(1)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.  ET - PTE is 0.3 tpy ^ stack testing will not be required as a demonstration of compliance.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
	SO2 exemption.	18-06 (A)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
K008, Automobile spray coating line with water wash particulate collector.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Use of a waterwash system.
	1.2 lbs of particulates per hour.	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - Use of a waterwash system. ET - Actual 1997 PM = 0.16 tpy ^ stack testing will not be required as a demonstration of compliance.
	15.1 lbs of VOC per gallon of deposited solids.	21-09 (C)(1) (a)(v)		N	Y	Y	Y	Y	N	
	15.1 lbs of VOC per gallon of deposited solids.	21-09 (C)(1) (c)		N	Y	Y	Y	Y	N	
	see Section A.I.2.a.	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - BAT established by PTI 04-585 as issued June 7, 1991.
	see Section A.I.2.b.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-585 as issued June 7, 1991.
	K008, 19.7 MM Btus gas direct fired bake oven.	SO2 exemption.	18-06 (A)		Y	Y	Y	Y	Y	N

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
K009 & K010, Automobile topcoat lines with water wash particulate collectors.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Use of a waterwash system.
	1.4 lbs of particulates per hour.	SO2 exemption.		Y	Y	Y	Y	Y	N	OR - Use of a waterwash system. ET - Actual 1997 PM = 0.08 tpy (K009) & 0.08 (K010) ^ stack testing will not be required as a demonstration of compliance.
	15.1 pounds of VOC per gallon of applied solids.	21-09 (C)(1) (c)		N	Y	Y	Y	Y	N	
	see Section A.I.2.a.	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - BAT established by PTI 04-585 as issued June 7, 1991.
	see Section A.I.2.b.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-585 as issued June 7, 1991.
K009 & K010, 9.6 MM Btus gas direct fired bake oven, each.	SO2 exemption.	18-06 (A)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.
K021, Automobile final repair topcoat line with infrared lamps and exhaust filters.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Use of an exhaust filtration system.
	0.551 lb of particulates per hour.	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - Use of an exhaust filtration system. ET - Actual 1997 PM = 0.00 tpy ^ stack testing will not be required as a demonstration of compliance.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
	4.8 lbs of VOC per gallon of coating.	21-09 (C)(1)(d)		N	Y	Y	Y	Y	N	Basis - actual 1997 OC = 0.04 tpy ^ limitation with no control is appropriate.
	6.2 tons per year of VOC.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-128 as modified October 1, 1986.
K022, Automobile final repair topcoat coating line with water wash collector.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - use of a waterwash system.
	0.551 pounds of particulates per hour.	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - use of a waterwash system. ET - Actual 1997 PM = 0.02 tpy ^ stack testing will not be required as a demonstration of compliance.
	4.8 lbs of VOC per gallon of coating.	21-09 (C)(1)(d)		N	Y	Y	Y	Y	N	
	16.7 tons per year of VOC.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - netting limitations established by PTI 04-451 as modified June 8, 1989.
K022, 3.2 MM Btus gas direct fired bake oven.	SO2 exemption.	18-06 (A)		Y	Y	Y	Y	Y	N	OR - Inherently clean fuel requirement.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
K025, Automobile sound deadener booth with exhaust filters.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Use of an exhaust filtration system.
	0.75 lb of particulates per hour.	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - Use of an exhaust filtration system.  ET - Actual 1997 PM = 0.00 tpy ^ stack testing will not be required as a demonstration of compliance.
	3.4 lbs of VOC per gallon of coating.	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - BAT established by PTI 04-451 as modified June 8, 1989.
	4.8 lbs of VOC per gallon of coating.	21-09 (U)(1) (d)		N	Y	Y	Y	Y	N	Basis - Less stringent than the BAT established by PTI 04-451 as modified June 8, 1989.
	371.5 tons per year of VOC.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-451 as modified June 8, 1989.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
K026, Automobile sound deadener line with exhaust filters.	20 % opacity as a 6 minute average.	17-07 (A)(1)		Y	Y	Y	Y	Y	N	OR - Use of an exhaust filtration system.
	0.551 lb of particulates per hour.	17-11 (B)(1)		Y	Y	Y	Y	Y	N	OR - Use of an exhaust filtration system.  ET - Actual 1997 PM = 0.00 tpy ^ stack testing will not be required as a demonstration of compliance.
	CDK wax - 5.6, undercoating - 3.6, sound deadener - 3.4, NOx rust - 0.39 lbs of VOC per gallon of coating.	31-05 (A)(3)		N	Y	Y	Y	Y	N	Basis - BAT established by PTI 04-353, as issued January 7, 1987.
	see Section A.I.2.b.	21-09 (U)(2) (f)(ii), (U)(3)		N	Y	Y	Y	Y	N	Basis - The VOC emissions limitations were exempted from OAC rule 3745-21-09(U)(1)(d) requirements by the OAC rule 3745-21-09(U)(2)(f)(ii) determination of PTI 04-353, as issued January 7, 1987.
	32.6 tons per year of VOC.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitations established by PTI 04-353 as issued January 7, 1987.
K037, Sealers and adhesives	3.5 pounds of VOC per gallon of coating.	21-09 (U)(1) (d), (U)(3)		N	Y	Y	Y	Y	N	Basis - Adhesives and sealers are typically extruded, no particulate emissions are anticipated.
K037, Glass adhesion body primer	4.9 lbs of VOC per gallon of coating.	21-09 (U)(1) (g)		N	Y	Y	Y	Y	N	Basis - Primer is brushed on, no particulate emissions are anticipated.

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
P021, Misc. solvents	Exemption from VOC emissions limitations.	21-07 (G)(9) (f)		Y	Y	Y	Y	Y	N	OR - Exclusive use of non-photochemically reactive materials.
P022, Purge and booth cleaning solvents.	914 tons of VOC per rolling 12-month period.	31-05 (D)		N	Y	Y	Y	Y	N	Basis - Netting limitation established by PTI 04-585 as issued June 7, 1990.
T006 & T007, 15,000 gallon horizontal tanks.	see Section A.I.2.a.	N	Y	N	Y	Y	Y	Y	N	Basis - NSPS Kb requirements established by PTI 04-579 as issued April 25, 1990.
	see Section A.I.2.b.	21-09 (L)(2)		N	Y	Y	Y	Y	N	Basis - Tank is exempt from 3745-21-09 (L)(1) because the capacity is less than 40,000 gal.
	see Section A.II.1.	31-05 (A)(3)		Y	Y	Y	Y	Y	N	Basis - BAT requirement established in PTI 04-579 as issued April 25, 1990. OR - Submerged fill pipe(s) installed within six inches of the tank bottom.
	0.08 tons of VOC per year.	31-05 (D)		N	Y	Y	Y	Y	Y	Basis - Netting limitation established by PTI 04-579 as issued April 25, 1990.

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping 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 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. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section.

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 comments. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- C Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.