

Statement of Basis For Title V Permit

| | | |
|---|---------------------------------------|--|
| Company Name | Chrysler Corporation, Stickney Avenue | |
| Premise Number | 0448010414 | |
| Number of Non-insignificant Emissions Units | 44 | |
| What makes this facility a Title V facility? | NOx, VOC & HAPs | |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)? | Y | |

| Part II (State and Federally Enforceable Requirements) | | | |
|---|-----------------|-------|---|
| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
| A.1. | Y | N | Basis - OAC rules 3745-77-02(G) and 3745-77-10(A) |
| A.2 through A.6 | N | Y | Basis - established by the BAT determination of OAC rule 3745-31-05(A)(3) (SO2) and by the PSD determination of OAC 3745-31-10 thru 20 (CO, NOx, PM 10 and VOC) of PTI 04-01102 as modified September 6, 2000. More stringent than the summation of the individual permit allowables. |
| A.7. | N | Y | Basis - MACT hammer requirements |
| | | | |

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 | | | | | | | |
| B008, B009 & B010 - 32.66 mmBtu/hour hot water generators, natural gas fired with low NOx burners | 11.73 tpy CO, 7.15 tpy NOx, 0.027 tpy PE, 0.086 tpy SO2, 0.77 tpy VOC | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified ?. OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 1.07 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| | 0.082 lb CO/mmBtu, 0.05 lb NOx/mmBtu, 0.0019 lb PE/mmBtu, , 0.0006 lb SO2/mmBtu, 0.0054 lb VOC/mmBtu, and 5 percent opacity. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3) BAT determination of PTI 04-01102 as modified ?. OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 1.07 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|--|---|---------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| B011, B012, B014, B016, B017 & B019 - 12.02 mmBtu/hr direct fired natural gas air makeup units, no control burners | 0.082 lb CO, 0.098 lb NOx, and 0.0054 lb VOC/mmBtu actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 1.84 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| | 4.32 tons CO/yr, 5.16 tons NOx/yr, 0.28 ton VOC/yr | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3) BAT determination of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 1.84 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| B013, B015, B023, B024 & B025 - 15.03 mmBtu/hr direct fired natural gas air makeup units, no control | 0.082 lb CO, 0.098 lb NOx, and 0.0054 lb VOC/mmBtu actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 2.31 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| | 5.4 tons CO/yr, 6.45 tons NOx/yr, and 0.36 ton VOC/yr. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3) BAT determination of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 2.31 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|--|---|---------------------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| B018, B021, B026 & B027 - 13.53 mmBtu/hr direct fired natural gas air makeup units, no control | 0.082 lb CO, 0.098 lb NOx, and 0.0054 lb VOC/mmBtu actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 2.08 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| | 4.86 tons CO/yr, 5.8 tons NOx/yr, and 0.32 ton VOC/yr. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3) BAT determination of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 2.08 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| B020 & B022 - 10.52 mmBtu/hr direct fired natural gas air makeup units, no control | 0.082 lb CO, 0.098 lb NOx, and 0.0054 lb VOC/mmBtu actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 1.61 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| | 3.78 tons CO/yr, 4.52 tons NOx/yr, and 0.25 ton VOC/yr. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3) BAT determination of PTI 04-01102 as modified ?. Direct fired units are not regulated for particulate by OAC rules 3745-17-07 or 10(B)(1). OR - restricted to clean fuel. ET - emissions of NOx for 2002 were estimated at 1.61 tons/yr for each boiler, making these a non-major emissions units and not subject to additional stack testing per Engineering Guide #16. |
| F001 - plant roadways and parking lots | No visible particulate emissions, Stickney | 17-07 (B)(4) | N | N | Y | Y | Y | Y | N | Basis - source in operation prior to 1974. The Stickney Avenue Plant has no unpaved roadways or parking lots. |
| | RACM | 17-08 (B), (B)(8), (B)(9) | N | N | Y | Y | Y | Y | N | Basis - OEPA template #104 |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|-------------------------------------|--|-----------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| | No visible particulate emissions, TNAP | N | Y | N | Y | Y | Y | Y | N | Basis - BAT determination of PTI 04-01102 as modified ? The Toledo North Assembly Plant has no unpaved roadways or parking lots. |
| | BAT measures | N | Y | N | Y | Y | Y | Y | N | Basis - BAT determination of PTI 04-01102 as modified ? This level of control is equivalent to a potential to emit of 0.32 lb PE/hr and 1.4 tons PE/yr total for all of the roadways and parking areas at TNAP. |
| G002 - gasoline dispensing facility | Stage I | N | Y | Y | Y | Y | Y | Y | N | Basis - BAT determinations established by OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. OR- Stage I equipment requirements. |
| | Stage II | N | Y | Y | Y | Y | Y | Y | N | Basis - BAT determinations established by OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. OR- Stage II equipment requirements. |
| | throughput limitation | N | Y | N | Y | Y | Y | Y | N | Basis - BAT determinations established by OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. |
| | 2.3 tons of VOC per rolling 12-month period. | N | Y | Y | Y | Y | Y | Y | N | Basis - Netting limitations established by OAC rule 3745-31-05(D) in PTI 04-830 as issued June 30, 1993. Requires Stage II type vapor recovery equipment to meet this limitation. A short term limitation is considered to be inappropriate for this type of fugitive source. OR, M, R , Rp - equivalent to those required for Stage II. |
| G003 - gasoline dispensing facility | Stage I | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98. OR- Stage I equipment requirements. |
| | Stage II | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98. OR- Stage II equipment requirements. |
| | 34 tons of VOC year | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 issued 6/26/98. Requires Stage II type vapor recovery equipment to meet this limitation. A short term limitation is considered to be inappropriate for this type of fugitive source. OR, M, R , Rp - equivalent to those required for Stage II. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments | |
|---|--|-----------------|-------|----|---|---|----|----|------|---|---|
| | | SIP (3745-) | Other | | | | | | | | |
| K008. K009 & K010 Automotive off-line repair booth, Stickney Plant. | 4.8pounds of VOC pergallon. | N | Y | N | Y | Y | Y | Y | Y | Basis - BAT determinations established by OAC 3745-31-05(A)(3) in PTI 04-747 as issued July 13, 1992. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-747 as issued July 13, 1992. | |
| | 38.4 pounds of VOC per day for K008- K010. | N | Y | N | Y | Y | Y | Y | N | Basis - BAT determinations established by OAC 3745-31-05(A)(3) in PTI 04-747 as issued July 13, 1992. This permit limitation was originally written as a summation for emissions units K008 through K015; K011 through K015 have been removed from service. | |
| | 6.0tons of VOC per rolling 12-month period for K008- K010. | N | Y | N | Y | Y | Y | Y | N | Basis - BAT determinations established by OAC 3745-31-05(D) in PTI 04-747 as issued July 13, 1992 (synthetic minor limitation). This permit limitation was originally written as a summation for emissions units K008 through K015; K011 through K015 have been removed from service. | |
| | 20percent opacity | 17-07 (A)(1) | N | Y | Y | Y | Y | Y | Y | N | OR - CAM does not apply. Use of a dry filtration system will assure compliance. |
| | 0.551 pound of particulate matter per hour. | 17-11 (B)(1) | N | Y | Y | Y | Y | Y | Y | N | OR - CAM does not apply. Estimated emissions are too low to justify stack testing at this time. Due to the relative ease of particulate capture for this operation, the continuous use of a dry filtration system will be adequate to demonstrate compliance. UMRE < 10 lbs/hr. |
| K016 - Sound deadener spray booth. | 1.4pounds of particulate emissions per hour. | N | Y | Y | Y | Y | Y | Y | N | Basis - BAT determination of PE are estimated at maximum rate of application with a transfer efficiency of 80% and a 98% effective control by filtration. This source is not currently subject to CAM. Due to the relative ease of particulate capture for this operation, the continuous use of a dry filtration system will be adequate to demonstrate compliance. More restrictive than OAC rule 3745-17-11(B)(1) (process weight rate = 362 lb/hr for a table 1 limit of 1.5 #/hr and UMRE = 72 lbs/hr for a figure II limitation of 9.2 lb PE/hr. OR - CAM does not apply. Estimated emissions are too low to justify stack testing at this time. Due to the relative ease of particulate capture for this operation, the continuous use of a dry filtration system will be adequate to demonstrate compliance. | |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|---|-----------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| | 6.13 tons of PE per year | N | Y | N | Y | Y | Y | Y | N | Basis - BAT determination of PE are estimated at maximum rate of application with a transfer efficiency of 80% and a 98% effective control by filtration. Actual emissions are estimated at 0.87 tons for 1996. This source is not currently subject to CAM. Due to the relative ease of particulate capture for this operation, the continuous use of a dry filtration system will be adequate to demonstrate compliance. |
| | 0 pound of VOC per gallon. | N | Y | N | Y | Y | Y | Y | N | Basis - not subject to NSPS requirements. This emissions unit was not included in Netting calculations because it is restricted to 0 VOC per gallon by State BAT requirements. More restrictive than OAC rule 3745-21-09(U)(1)(d) |
| | 20 percent opacity. | 17-07 (A)(1) | N | Y | Y | Y | Y | Y | N | Basis - Equal to BAT. OR - use of a dry filtration system will assure compliance. |
| K018 & K019 - Automotive off-line repair (low temperature bake) Spovens (combination spray booth and electric oven) w/ dry filtration | 4.8 pounds of VOC per gallon | N | Y | N | Y | Y | Y | Y | Y | Basis - established by the BAT determination of OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. More restrictive than OAC rule 3745-21-09(C)(1)(c). Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. |
| | 9.8 lbs VOC/day | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT determination of OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. |
| | 0.12 ton VOC/mo | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT determination of OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. |
| | 1.5 tons of VOC per rolling 12-month period | N | Y | N | Y | Y | Y | Y | N | Basis - established by the synthetic minor limitations of OAC rule 3745-31-05(D) in PTI 04-830 as issued June 30, 1993. |
| | 20 percent opacity | 17-07 (A)(1) | N | Y | Y | Y | Y | Y | N | OR - use of a dry filtration system will assure compliance. |
| | 0.551 lb/hr PE | 17-11 (B)(1) | N | Y | Y | Y | Y | Y | N | Basis - established by table I, UMRE < 10 lbs/hr. OR - use of a dry filtration system will assure compliance. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|--|--|---------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| K021 - Electrodeposition (E-Coat) prime coat of automobile bodies with RTO on oven exhaust | 0.23 pound of VOC per gallon of applied solids | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745-21-09(C)(1)(c) and NSPS MM. OR - operating temperature restrictions to assure compliance. Stack test results performed October 29, 2001 indicated a destruction efficiency of 97.4% at 1,375 degrees Fahrenheit. ET - emissions of VOC for 2000 were estimated at 2.52 tons/yr, making this a non-major emissions unit and not subject to additional stack testing per Engineering Guide #16. This RTO is shared with K023, which is a major emissions unit, and stack testing will be required for that source. |
| | 52.01 tons of VOC per rolling 12-month period | N | Y | Y | Y | Y | Y | Y | Y | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. OR - operating temperature restrictions to assure compliance. Stack test results performed October 29, 2001 indicated a destruction efficiency of 97.4% at 1,375 degrees Fahrenheit. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. |
| | 5 percent opacity from the RTO stack | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. More stringent than OAC rule 3745-17-07(A)(1). Since no spraying of coating occurs, the bodies are dipped, OAC 3745-17-11 is not applicable. |
| K021 - 26.0 mmBtu/hr indirect fired, natural gas drying oven combustion emissions | 0.098 lb NOx, 0.019 lb PE, and 0.0054 lb VOC/mmBtu of actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745-17-10(B)(1). OR - restricted to clean fuel. |
| | 0.082 lb CO and 0.0006 lb SO2/mmBtu of actual heat input. | N | Y | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. OR - restricted to clean fuel. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|--|---------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| | 9.3 tons CO/yr, 11.2 tons NOx/yr, 2.2 tons PE/yr, 0.07 ton SO2/yr, & 0.61 ton VOC/yr | N | Y | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. Equal to PTE at 26.0 mmBtu/hr. OR - restricted to clean fuel. |
| | 5 percent opacity from each oven combustion stack | 17-11 (B)(1) | N | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. OR - restricted to clean fuel. More restrictive than OAC rule 3745-17-07(A)(1). |
| K022 - Electrostatic powder anti-chip guidecoat with particulate filtration for overspray | 1.40 kgs VOC/liter of applied coating solids. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745-21-09(C)(1)(c) and NSPS MM. ET - no controls; compliance demonstrated by record keeping. |
| | 3.25 tons of VOC per rolling 12-month period | N | Y | N | Y | Y | Y | Y | Y | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. BAT does not establish an OAC rule 3745-17 limitation as all PE emissions are released inside the building. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|--|---------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| K022 - 35.8 mmBtu/hr natural gas curing oven combustion emissions | 0.082 lb/mmBtu input CO, 12.9 tons CO/yr, 15.4 tons NOx/yr, 3.0 tons PE/yr, 0.0006 lb/mmBtu input SO2, 0.094 ton SO2/yr, & 0.85 ton VOC/yr | N | Y | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. OR - restricted to clean fuel. |
| | 0.098 lb NOx, 0.019 lb PE, and 0.0054 lb VOC/mmBtu of actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More restrictive PE restriction than OAC rule 3745-17-10(B)(1). OR - restricted to clean fuel. |
| | 5 percent opacity | N | Y | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745-17-07(A)(1). OR - restricted to clean fuel. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments | |
|---|---|---------------|-------|----|---|---|----|----|------|---|--|
| | | SIP (3745-) | Other | | | | | | | | |
| K023 - 2 automotive topcoat booths w/ water wash filtration & RTO on 2 clearcoat drying oven exhausts ; TNAP. | 2.8 tpy PE, 768.68 tpy VOC | N | Y | Y | Y | Y | Y | Y | Y | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified ??????. OR - operating restrictions to assure compliance with PE restrictions. RTO operating temperature restrictions to assure VOC compliance. Stack test results performed October 29, 2001 indicated a destruction efficiency of 97.4% at 1,375 degrees Fahrenheit. Also requires use of a water wash filtration. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. | |
| | 5 percent opacity from the RTO stack | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745 -17-07(A)(3). | |
| | 100% capture and a minimum of 95 % control of VOC | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. OR - RTO operating temperature restrictions to assure VOC compliance. Stack test results performed October 29, 2001 indicated a destruction efficiency of 97.4% at 1,375 degrees Fahrenheit. ET - compliance demonstrated by temperature record keeping and intermittent stack testing which constitutes CAM for VOC. | |
| | 0.63 lbs PE/hr | 31-10 thru 20 | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified ??????. Equal to OAC rule 3745-17-11(A)(2) Table I limitation with process weight rates given in the Title V application, i.e., a maximum of 6.25 gal/hr of a 8.80 #/gal base coat and 7.82 gal/hr of a 8.64 #/gal clear coat or 123 lb/hr. This is more restrictive than the Figure II limitation based on a UMRE of 37.2 lb/hr for an allowable of 5.6 lb/hr. OR - restricted to clean fuel. |
| | 8.63 lbs VOC/gal of applied coating solids | 31-10 thru 20 | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More restrictive than the OAC rule 3745-21-09(C)(1)(c) limitation of 15.1 pounds VOC per gallon of deposited solids with a minimum transfer efficiency of 71% based on testing performed in June of 2001, or NSPS MM limitation of 1.47 kg/l (12.26 lb/gal) of coating solids. |

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|--|---|---------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| K023 - two 22.2 mmBtu/hr natural gas curing ovens combustion emissions | 0.082 lb CO/mmBtu, 15.9 tons CO/yr, 19.1 tons NOx/yr, 3.7 tons PE/yr, 0.0006 lb SO2/mmBtu, 0.12 ton SO2/yr, & 1.1 tons VOC/yr | N | Y | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. Emission limitations are based on a combined total of 44.4 mmBtu/hr. OR - restricted to clean fuel. NOTE: Application shows 66mmBtu total |
| | 0.098 lb NOx, 0.019 lb PE, and 0.0054 lb VOC/mmBtu of actual heat input. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More restrictive PE restriction than OAC rule 3745-17-10(B)(1). OR - restricted to clean fuel. |
| | 5 percent opacity from each oven combustion stack | N | Y | Y | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745-17-07(A)(1). OR - restricted to clean fuel. More restrictive than OAC rule 3745-17-07(A)(1). |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|--|---------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| K024 - Automotive off-line repair (low temperature bake) Spoven (combination spray booth and electric oven) w/ dry filtration ; TNAP. | 28 tons VOC/per rolling 12-month period, 2.4 tons PE/yr, | N | Y | N | Y | Y | Y | Y | Y | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. OR - requires use of a fabric filter. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. |
| | 5 percent opacity | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745 -17-07(A)(3). OR - requires use of a fabric filter. |
| | 0.551 lb PE/hr. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. Equivalent to the Figure I PE restriction or OAC rule 3745-17-11(A)(2). UMRE is 14 pounds per hour for a Table II limit of 1.4 lb/hr. OR - requires use of a fabric filter. |
| | 4.8 lbs of VOC/gal of coating. | 31-10 thru 20 | N | N | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. Equivalent to the VOC restriction or OAC rule 3745-21-09(C)(1)(d). |
| K027 - Automotive blackout w/ dry filtration ; air dried; TNAP. | 54 tons VOC/per rolling 12-month period, 2.4 tons PE/yr | N | Y | Y | Y | Y | Y | Y | Y | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified ?????????? OR - requires use of a fabric filter. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. |
| | 5 percent opacity | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. More restrictive than OAC rule 3745 -17-07(A)(3). OR - requires use of a fabric filter. |
| | 0.551 lb PE/hr. | 31-10 thru 20 | N | Y | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. Maximum rate of application is 1 gal/hr of a 9.4 lb/gal coating which is 40.35% solids by weight. Equal to the Figure I PE restriction of OAC rule 3745-17-11(A)(2). UMRE is less than 10 pounds per hour so Table II does not apply. OR - requires use of a fabric filter. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|---|------------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| | 2.0 lbs VOC/gal of coating | 31-10 thru 20 | N | N | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. More stringent than the 4.8 #/gal VOC restriction of OAC rule 3745-21-09(C)(1)(d). NSPS MM does not apply. |
| K029 - Automotive off-line touch-up repair w/ dry filtration ; air dry; TNAP. | 5.6 tons VOC per rolling 12-month period | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. Misc - nuisance odor restrictions established by OAC 3745-31-05(A)(3) in PTI 04-01102 as modified September 6, 2000. |
| | 5 percent opacity | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the BAT limitations of OAC rule 3745-31-05(A)(3) in PTI 04-01102 as modified ???????. Emission from interior painting are considered fugitive only, are controlled through operating practice and no #/hr or TPY limitation was established. More restrictive than OAC rule 3745-17-07(B)(1). Fugitive emissions are based on a 3-min average. OR - requires use of a fabric filter. |
| | 4.8 lbs of VOC/gal of coating. | 21-09 (C)(1) (d) | N | N | Y | Y | Y | Y | N | Basis - established by the PSD determination of OAC 3745-31-10 thru 20 of PTI 04-01102 as modified September 6, 2000. Equivalent to the VOC restriction or OAC rule 3745-21-09(C)(1)(d). |
| P002 - window installation | 12.5lbs/hr & 200 lbs VOC per day | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT determination of OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. May be more restrictive than OAC rule 3745-21-07(G)(2) and/or 21-09(U)(1)(i) but since 21-07 regulates OC applied to non-metallic surfaces and 21-09 applies only to metallic surfaces, no direct comparison can be made. |
| | 30 tons of VOC per rolling 12-month period. | N | Y | N | Y | Y | Y | Y | N | Basis - established by the netting limitations of OAC rule 3745-31-05(D) in PTI 04-830 as issued June 30, 1993. ET - compliance is demonstrated through M R & Rp for the throughput restrictions of: side window primer; 4.9 lbs of VOC/gal and 400 gal/month, windshield cleaner; 6.2 lbs of VOC/gal and 129.4 gal/month, side glass primer; 6.9 lbs of VOC/gal and 40.3 gal/month, and blackout primer; 4.9 lbs of VOC/gal and 400 gal/month. |
| | 40 lbs/d & 8lbs/hr of OC. | 21-07 (G)(2) | N | N | Y | Y | Y | Y | N | Basis - not subject to NSPS requirements. This limitation applies only to photochemical materials on non-metallic surfaces. |
| | 3.0pounds of VOC per gallon | 21-09 (U)(1) (i) | N | N | Y | Y | Y | Y | N | Basis - not subject to NSPS requirements. This limitation applies only to materials on metallic surfaces. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|--|------------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| P003 - sealer and adhesive application with no control. | 26.7 lbs VOC/day & 667 lb VOC/mo | N | Y | Y | Y | Y | Y | Y | N | Basis - established by the BAT determination of OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. May be restrictive than OAC rule 3745-21-07(G)(2) and/or 21-09(U)(1)(i) but since 21-07 regulates OC applied to non-metallic surfaces and 21-09 applies only to metallic surfaces, no direct comparison can be made. OR - forbids asbestos based door sealer. |
| | 4.0 tons of VOC per rolling 12-month period. | N | Y | N | Y | Y | Y | Y | N | Basis - established by the netting limitations of OAC rule 3745-31-05(D) in PTI 04-830 as issued June 30, 1993. ET - compliance is demonstrated through M R & Rp for the throughput restrictions of: silencer adhesive; 0.26 lb of VOC/gal excluding water and exempt solvents, 0.15 lb of VOC/gal including water and exempt solvents and 247 gal/month as applied, including water and exempt solvents, windshield sealer or equivalent; 1.5 lbs of VOC/gal excluding water and exempt solvents and 140 gal/month, and door sealer or equivalent; 2.8 lbs of VOC/gal minus water and exempt solvents and 150 gal/month. |
| | 40 lbs/d and 8 lbs/hr of OC. | 21-07 (G)(2) | N | N | Y | Y | Y | Y | N | Basis - not subject to NSPS requirements. This limitation applies only to photochemical materials on non-metallic surfaces. |
| | 3.5 pounds of VOC per gallon. | 21-09 (U)(1) (c) | N | N | Y | Y | Y | Y | N | Basis - not subject to NSPS requirements. This limitation applies only to materials on metallic surfaces |
| P004 - miscellaneous solvents and cleaners with no control. | 200.0 lbs VOC/day & 2.5 ton VOC/mo | N | Y | N | Y | Y | Y | Y | N | Basis - established by the BAT determination of OAC 3745-31-05(A)(3) in PTI 04-830 as issued June 30, 1993. These emissions are not associated directly with an OAC rule 3745-21-07(G)(2) source. The permittee has chosen to lump these emissions into a facility-wide pseudo-emissions unit. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|---|---|-----------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| | 30.0 tons of VOC per rolling 12-month period. | N | Y | N | Y | Y | Y | Y | N | Basis - established by the netting limitations of OAC rule 3745-31-05(D) in PTI 04-830 as issued June 30, 1993. ET - compliance is demonstrated through M R & Rp for the throughput restrictions of: body wipe solvent or equivalent; 6.8 lbs of VOC/gal excluding water and exempt solvents and 368 gals/month, booth cleaner or equivalent; 7.4 lbs of VOC/gal excluding water and exempt solvents and 176 gals/month, and machine cleaner or equivalent; 6.8 lbs of VOC/gal excluding water and exempt solvents and 176 gals/month. |
| P007 - Non-production maintenance materials ; TNAP. | 514.18 tons of VOC per rolling 12-month period. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98 and modified? This emissions unit was designated separately to account for the facility-wide use of cleaning materials which would not normally be associated with a permitted source. These fugitive emissions are not readily tracked and no provision has been added for hourly limitations. OR - appropriate handling techniques as control measures. |
| P008 - miscellaneous solvents and cleaners with no control. | 0.5 lb VOC/gal as a monthly average. | N | Y | N | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-10 thru 20 OAC rule 3745-31-05(A)(3) in PTI 04-01102 as issued 6/26/98 and modified? Exempt from OAC rule 3745-21-07(G) by (G)(9)(f) exemption for non-photochemically reactive material. |
| | 140 tons of VOC per rolling 12-month period. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98 and modified? OR - appropriate handling techniques as control measures. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|--|---|-----------------|-------|----|---|---|----|----|------|--|
| | | SIP (3745-) | Other | | | | | | | |
| P009 - Miscellaneou solvents, solvent body wipes and use of other nonphotochemically reactive solvents; TNAP.. | 96.9 tons of VOC per rolling 12-month period. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98 and modified? This emissions unit was designated separately to account for the facility-wide use of solvents which would not normally be associated with a permitted source. These fugitive missions are not readily tracked and no provision has been added for hourly limitations. OR - appropriate handling techniques as control measures. |
| P010 - Miscellaneou solvents, plantwide use of photo-chemical ly reactive solvents; TNAP. | 40 lbs/d and 8 lbs/hr of OC. | N | Y | N | Y | Y | Y | Y | N | Basis - established by OAC rule 3745-31-10 thru 20 OAC rule 3745-31-05(A)(3) in PTI 04-01102 as issued 6/26/98 and modified? Equivalent to the SIP limitations of OAC rule 3745-21-07(G)(2). |
| | 5.1 tons of VOC per rolling 12-month period. | N | Y | Y | Y | Y | Y | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98 and modified? OR - appropriate handling techniques as control measures |
| P011 - Body In White (BIW) Inspection and Grinding , building enclosure control; TNAP | 2.1 tons PE per rolling, 12-month period | N | Y | Y | N | N | N | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98 and modified ??????. OR - adequate enclosure and control. M, R & Rp - these limitations represent the maximum potential to emit while utilizing adequate enclosure and control, therefore no additional M, R & Rp requirements have been added. |

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
|--|--|--------------|-------|----|---|---|----|----|------|---|
| | | SIP (3745-) | Other | | | | | | | |
| | Visible particulate emissions shall not exceed 20 percent opacity, | N | Y | Y | Y | Y | Y | Y | N | Basis - equivalent to 3745-17-07(B)(1) established by OAC rule 3745-31-10 thru 20 OAC rule 3745-31-05(A)(3) in PTI 04-01102 as issued 6/26/98 and modified ??????. Equivalent to the SIP limitations of OAC rule 3745-21-07(G)(2). OR - adequate enclosure and control. M, R & Rp - these limitations represent the maximum potential to emit while utilizing adequate enclosure and control, therefore no additional M, R & Rp requirements have been added. |
| | 0.48 lb PE/hr. | N | Y | Y | Y | Y | Y | Y | N | Basis - equivalent to 3745-17-08(B)(3) established by OAC rule 3745-31-10 thru 20 OAC rule 3745-31-05(A)(3) in PTI 04-01102 as issued 6/26/98 and modified ??????. Equivalent to the SIP limitations of OAC rule 3745-21-07(G)(2). OR - adequate enclosure and control. M, R & Rp - these limitations represent the maximum potential to emit while utilizing adequate enclosure and control, therefore no additional M, R & Rp requirements have been added. |
| P012 - Finish welding, building enclosure; TNAP. | 2.4 tons PE per rolling, 12-month period | N | Y | Y | N | N | N | Y | N | Basis - OAC rule 3745-31-05(A)(3), established by PTI 04-01102 as issued 6/26/98 and modified? OR - adequate enclosure and control. M, R & Rp - these limitations represent the maximum potential to emit while utilizing adequate enclosure and control, therefore no additional M, R & Rp requirements have been added. |
| | Visible particulate emissions shall not exceed 20 percent opacity | N | Y | Y | Y | Y | Y | Y | N | Basis - equivalent to 3745-17-07(B)(1) established by OAC rule 3745-31-10 thru 20 OAC rule 3745-31-05(A)(3) in PTI 04-01102 as issued 6/26/98 and modified? Equivalent to the SIP limitations of OAC rule 3745-21-07(G)(2). OR - adequate enclosure and control. M, R & Rp - these limitations represent the maximum potential to emit while utilizing adequate enclosure and control, therefore no additional M, R & Rp requirements have been added. |
| | 0.56 lb PE/hr | N | Y | Y | Y | Y | Y | Y | N | Basis - equivalent to 3745-17-08(B)(3) established by OAC rule 3745-31-10 thru 20 OAC rule 3745-31-05(A)(3) in PTI 04-01102 as issued 6/26/98 and modified? Equivalent to the SIP limitations of OAC rule 3745-21-07(G)(2). OR - adequate enclosure and control. M, R & Rp - these limitations represent the maximum potential to emit while utilizing adequate enclosure and control, therefore no additional M, R & Rp requirements have been added. |

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.