



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

02/20/02

**CERTIFIED MAIL**

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

08-57-10-1349  
General Motors Corporation - Moraine Assembly  
David V. Kloppenburg  
2601 W Stroop Rd.  
Dayton, OH 45439

Dear David V. Kloppenburg:

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.

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 or comments concerning this draft Title V permit, please contact RAPCA.**

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

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



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 02/20/02	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**

B001 (Plantwide Process Natural Gas Usage) See Attached File: MORAPPXA.DOC	K024 (Deadner) See Attached File: MORAPPXB.DOC	K030 (Windshield Glass System (temporary location)) See Attached File MORAPPXB01.DOC
G001 (Gasoline Operation (Tank #1&#2-Gasoline/Gasoline Fill)) See Attached Files: MORAPPXA.DOC and MORAPPXB.DOC	K025 (Final Repair) See Attached File: MORAPPXB.DOC	P003 (Topcoat Sanding Booth) See Attached File: MORAPPXB.DOC
K020 (Pre-Phosphate Washers) See Attached File: MORAPPXB.DOC	K027 (Miscellaneous Sealers & Adhesives) See Attached File: MORAPPXB.DOC	T010 (Tank #10 - Windshield Washer Solvent) See Attached File: MORAPPXA.DOC
K022 (Primer Surfacer (Guidecoat) System) See Attached File: MORAPPXB.DOC	K028 (Miscellaneous Solvent Usage and Cleanup Operations) See Attached File: MORAPPXB.DOC	
K023 (Topcoat System) See Attached File: MORAPPXB.DOC	K029 (Prime Coat (ELPO) line with oven) See Attached File: MORAPPXB01.DOC (Revised document)	

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. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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  
 451 West Third Street  
 PO Box 972  
 Dayton, OH 45422  
 (937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

---

Christopher Jones  
 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, 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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. 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))*
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.6 below if no deviations occurred during the quarter.

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

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

- 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 are true, accurate, and complete.

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

## **3. Risk Management Plans**

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

*(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.

*(Authority for term: OAC rule 3745-77-07(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 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 emission 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; and
- 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(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**

Each insignificant activity 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))*

**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 (a) 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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 deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

#### **1. Operation Restrictions-**

- a. The maximum annual number of days of operation for this facility shall not exceed 300, based upon a rolling, 12-month summation of the number of days of operation each month.
- b. The maximum annual production rate for this facility shall not exceed 348,000 vehicles, based upon a rolling, 12-month summation of the vehicle production rate each month.

#### **2. 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.

#### **3. 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 300; and
- b. all exceedances of the vehicle production rate restriction of 348,000.

These quarterly deviation reports are due by the dates specified in Part I- General Terms and Conditions of this permit under Section A.1.c.

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

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

P001- EDP sanding booth  
P002- Guidecoat and minor 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  
T011- Tank #11 axle lube  
T012- Tank #12 power steering fluid  
T013- Tank #13 diesel fuel  
Z011- Laboratory equipment and laboratory fume hoods  
Z012- Compression and Injection plastic molding equipment  
Z013- Non-continuous solvent recycling units  
Z014- Solvent cold cleaners  
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  
Z023- Emergency diesel generators  
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  
Z043- Gasoline dispensing facilities  
Z044- Pre-washers  
Z045- Spot sanding and painting

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.

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

**Emissions Unit ID:** Plantwide Process Natural Gas Usage (B001)  
**Activity Description:** See Attached File: MORAPPA.DOC

#### 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>
facility-wide, natural gas combustion	OAC rule 3745-31-05(A)(3) PTI #08-2506	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-18-06(A), 3745-18-06(E) and 40 CFR, Part 52.21.
		17.0 tons/yr particulate emissions (PE)*
		71.40 tons/yr carbon monoxide (CO)*
		4.68 tons/yr volatile organic compounds (VOC)*
		0.020 lb PE/mmBtu of actual heat input (for each piece of equipment associated with this emissions unit)
	40 CFR, Part 52.21	*The annual emission limitation is based upon a rolling, 12-month summation.
		135.58 tons/yr nitrogen oxides (NOx)*
	OAC rule 3745-17-10(B)(1)	*The annual emission limitation is based upon a rolling, 12-month summation.
	OAC rule 3745-17-07(A)	0.020 pound of PE per mmBtu of actual heat input (See A.I.2.a.)
		Visible emissions 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 OC rule 3745-18-06(C) (See A.I.2.c.)

**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).

**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 includes natural gas consumption for emissions unit K029, prime coat (ELPO) line with oven, which replaced emissions unit K021.

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

- 1. 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.

**IV. Reporting Requirements**

- 1. 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. These quarterly deviation reports are due by the dates specified in Part 1- General Terms and Conditions of this permit under Section A.1.c.

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

2. The permittee shall submit annual reports that specify the total facility-wide natural gas consumption for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **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 -  
0.020 lb PE per mmBtu actual heat input

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(9).

- 1.b Emission Limitation -  
17.0 tons/yr PE, 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 and the lb PE/mmBtu limitation are maintained (the annual emission limitation was calculated by multiplying the maximum allowable facility-wide natural gas consumption rate 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).

- 1.c Emission Limitation -  
135.58 tons/yr nitrogen oxides, 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).

\* 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)].

- 1.d Emission Limitation -  
71.40 tons/yr carbon monoxide

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).

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

- 1.e** Emission Limitation -  
4.68 tons/yr volatile organic compounds, 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).

- 1.f** Emission Limitation-  
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).

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** See Attached Files: MORAPPXA.DOC and MORAPPXB.DOC

#### 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>
gasoline storage tanks: 2-15,000 gallon underground 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: 2 nozzles, Stage II vapor recovery gasoline dispensing facility	OAC rule 3745-21-09(DDD)  OAC rule 3745-31-05(A)(3) PTI 08-3719	95% control efficiency for VOCs  The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(R) and 3745-21-09(DDD).  4.98 tons organic compounds (OC)/year

##### 2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-21-09 (DDD)(1)(b), the Stage II vapor control system shall be installed, operated, and maintained in accordance with the applicable certification granted by the California Air Resources Board (CARB) as described in Section VI below.

Any figures or exhibits identified in this permit are available from the appropriate Ohio EPA District Office or local air agency upon request.

## 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.
2. The permittee shall comply with the following operational restrictions for the Stage II vapor control system:
  - a. The vapor control system shall be installed, operated and maintained in accordance with the manufacturer's specifications and the applicable certification granted by the CARB, and shall be free of the following defects:
    - i. Any component, that is required to be employed at all times pursuant to the system certification granted by the CARB, is absent or disconnected.
    - ii. A vapor hose is crimped or flattened such that the vapor passage is blocked, or the pressure drop through the vapor hose exceeds by a factor of two or more the requirements in the certification granted by the CARB.
    - iii. A vacuum producing device is inoperative or malfunctioning.
    - iv. Pressure/vacuum relief valves, vapor check valves, or dry breaks are inoperative.
    - v. Any vapor recovery equipment is leaking liquid gasoline or gasoline vapors.
    - vi. Any other equipment defect identified in the CARB certification as one which substantially impairs the effectiveness of the vapor control system.
  - b. The vapor control system must have successfully passed the testing requirements contained in paragraph (DDD)(2) of OAC rule 3745-21-09. These testing requirements are also specified in Sections V and VI.
  - c. Operating instructions for the vapor control system shall be conspicuously posted in each gasoline dispensing area. The operating instructions shall clearly describe how to properly fuel motor vehicles and shall specifically prohibit the topping off of the motor vehicle fuel tank.

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

1. The permittee shall maintain records of the results of any leak checks, 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.
2. The permittee shall maintain records of the following information:
  - a. The quantity of gasoline delivered to the facility during each calendar month.
  - b. The results of any tests performed pursuant to the testing requirements specified in this permit.
  - c. A log of the date and description of all repair and maintenance work performed (including, but not limited to, work performed to meet manufacturer's specifications or CARB certification requirements), or any other modifications made to the vapor control system.
  - d. Proof of attendance and completion of the training required by the Ohio EPA for the operator or local manager of the gasoline dispensing facility.
  - e. Copies of all completed post test inspection forms.
3. The permittee shall maintain records of the annual gasoline throughput, in gallons, for the facility.

### **IV. Reporting Requirements**

1. Any leak from the vapor balance system or vapor control system that is not repaired within 15 days after identification shall be reported to the Director within 30 days after the repair is completed.
2. A comprehensive written report on the results of any tests performed in accordance with the requirements of this permit shall be submitted within 30 days following the completion of the tests.

### **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)

Emission Limitation: 4.98 tons OC/year

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined by summing the OC emissions from all the gasoline storage tanks' filling and dispensing operations and, if applicable, diesel, kerosene, and used oil tank filling operations at the gasoline dispensing facility (unless otherwise exempted pursuant to OAC rule 3745-31-03). This calculation shall be based on the annual gasoline, diesel, kerosene, and used oil throughputs for the facility using the following calculation methodology and emission factors:

- a. Multiply the appropriate emission factor below by the number of gallons of gasoline dispensed per year and divide by 2000.
- b. Sum the results for each material used.

The following emission factors are expressed in pounds of OC per 1000 gallons of gasoline throughput. The emission factors are for the VOCs as well as the OC emissions (it is assumed that the methane and ethane contents of gasoline are negligible).

- a. Emission factors for gasoline storage tank filling and dispensing operations:
  - i. Submerged tank filling with Stage I vapor control for gasoline storage tanks: OC emission factor = 13.0 lbs OC/1000 gallons.
  - ii. Stage II vapor control for vehicle refueling: OC emission factor = 3.1 lbs OC/1000 gallons.

(Gasoline emission factors are from USEPA publication AP-42, Fifth Edition, Table 5.2-7.)

2. The Stage II vapor control system must successfully meet all requirements regarding testing contained in OAC rule 3745-21-09(DDD)(2). In accordance with the test procedures listed in OAC rule 3745-21-10, the following tests shall be performed: static leak test and dynamic pressure performance test.

At intervals not to exceed five (5) years, the permittee shall repeat and demonstrate compliance with the static leak test requirements contained in OAC rule 3745-21-10, Appendix A (unless a greater frequency is specified in the applicable CARB certification), and the dynamic pressure performance test requirements contained in OAC rule 3745-21-10, Appendix B (unless the dynamic pressure performance test is not applicable to the specific Stage II vapor control system, as specified in the applicable CARB certification).

Not later than thirty (30) days prior to any required tests, the permittee shall submit a test notification to the appropriate Ohio EPA District Office or local air agency.

The test notification shall describe the proposed test methods and procedures, the time and the date of the tests, and the person who will be conducting the tests. Failure to submit such notification prior to the tests may result in the Ohio EPA's refusal to accept the results of the tests. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information during the tests. After completion of any tests, the permittee shall complete and retain on site a copy of the post test inspection form contained in OAC rule 3745-21-10, Appendix C.

## VI. Miscellaneous Requirements

1. The OPW VaporEZ Stage II vapor recovery system employed at this facility, including all associated underground and aboveground plumbing, shall be installed, operated, and maintained in accordance with CARB Executive Order G-70-163, which includes, but is not limited to, the requirements contained within this Section.

## VI. Miscellaneous Requirements (continued)

2. The permittee shall comply with the following design and installation specifications from CARB Executive Order G-70-163:
  - a. The equipment approved for use with the OPW VaporEZ system is specified in Exhibit 1 of Executive Order G-70-163. Other equipment may not be used unless approved by CARB for use with the OPW VaporEZ system.
  - b. The maximum length of the coaxial hose shall be fifteen (15) feet, and the maximum allowable length of hose which may be in contact with the top of the island block, or ground, shall be six (6) inches.
  - c. Each vent pipe shall be equipped with a CARB certified pressure/vacuum relief valve. Plumbing may be manifolded to reduce the number of relief valves needed. The vent manifold may be used as an alternative to an underground manifold only in existing installations where vapor piping is already installed.
  - d. The settings of the pressure/vacuum relief valve(s) shall be as follows:
    - i. Pressure: Three (3.0) +/- one-half (0.5) inches of water column
    - ii. Vacuum: Eight (8.0) +/- two (2.0) inches of water column
  - e. Coaxial Stage I vapor recovery systems shall not be used with new installations of the OPW VaporEZ system. Coaxial Stage I systems may be used with existing installations if:
    - i. The existing coaxial Stage I system is a poppeted, CARB certified system.
    - ii. The installation of the Stage II system requires no modification of the underground storage tank(s) (UST(s)) and/or connections.
    - iii. The existing coaxial Stage I equipment is in good working order and has demonstrated compliance with Static Leak Test criteria when tested with all fill caps removed.
3. The permittee shall comply with the following operational restrictions from CARB Executive Order G-70-163:
  - a. The OPW VaporEZ system shall be maintained in accordance with the System Operating Manual approved by CARB. Any alteration of the equipment, parts, design, or operation of the system is prohibited unless approved by CARB.
  - b. The maximum dispensing rate shall not exceed ten (10.0) gallons per minute (gpm). Compliance with this condition shall be verified with only one nozzle in operation per product supply pump.
  - c. One (1) Blackmer model VRFO pump shall be installed for each dispensing nozzle. The pump shall be serviced only by a qualified contractor, and field service of the pump is prohibited.
  - d. Hose breakaways are optional for the OPW VaporEZ system, but, if installed, only CARB certified breakaways which close the vapor path shall be used.
  - e. An efficiency compliance device (ECD) shall be installed on each nozzle as shown in Executive Order G-70-163. Any nozzle with an ECD which is missing, or which is damaged such that at least one-eighth (1/8) of the diameter is missing, or which has a cumulative damage equivalent to at least 1/8 of the diameter, is defective and shall be immediately removed from service.
  - f. Vapor collection holes in the nozzle spout shall remain unblocked. Any nozzle with blocked vapor collection holes is defective and shall be immediately removed from service.
4. The permittee shall comply with the following performance specification from CARB Executive Order G-70-163:

The air-to-liquid ratio (A/L) shall be between 0.90 and 1.10 when tested in accordance with an A/L test procedure adopted by the Ohio EPA.

**VI. Miscellaneous Requirements (continued)**

5. The permittee shall comply with the following monitoring requirement from CARB Executive Order G-70-163:  
  
The permittee shall monitor the Stage II vapor recovery system performance and all aspects of operation to the extent necessary to ensure compliance with the conditions and specifications contained within this Section.
6. The permittee shall comply with the following testing requirement from CARB Executive Order G-70-163:  
  
In accordance with the yearly static pressure decay testing requirement specified in CARB Executive Order G-70-163, the Static Leak Test contained in OAC rule 3745-21-10, Appendix A, shall be successfully conducted at least once in each twelve- consecutive-month period after the date of successful completion of the startup or most recent Static Leak Test. The appropriate Ohio EPA District Office or local air agency shall be notified at least 30 days prior to conducting these annual tests. Test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days of testing.
7. The permittee shall comply with the following record keeping requirement from CARB Executive Order G-70-163:  
  
A log of the date and description of all repair and maintenance work performed on the OPW VaporEZ system shall be maintained on site or otherwise provided to Ohio EPA field office personnel immediately upon request.

**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>
---	---	--

**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:** See Attached File: MORAPPXB.DOC

#### 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>
pre-phosphate washers; preclean deck	OAC rule 3745-31-05(A)(3) PTI # 08-2506	8.3 lbs/hr, 133.4 lbs/day, 20.01 tons/yr of organic compounds (OC)  (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).
	OAC rule 3745-21-07(G)	none (See A.II.1.)

##### 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.

##### II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

### 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 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 (bxc) 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. Documentation on whether or not each material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 20.01 tons and the daily OC emission limitation of 133.4 lbs. The quarterly reports shall be submitted in accordance with paragraph A.1.c. of Part I, General Terms and Conditions, of this permit.
2. 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.
3. The permittee shall submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance Method-

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 -  
8.3 lbs/hr of OC

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.

- 1.b Emission Limitation-  
20.01 tons OC/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.

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

- 1.c** Emission Limitation-  
133.4 lbs/day OC

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.

- 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.

## **VI. Miscellaneous Requirements**

- 1.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** See Attached File: MORAPPXB.DOC

#### 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>
primer surfacer system; powder guidecoat	OAC rule 3745-31-05(A)(3) PTI # 08-2506	0.05 lb volatile organic compounds (VOC)/gallon coating, excluding water and exempt solvents  2.2 lbs/hr, 34.8 lbs/day, 5.22 tons/yr VOC  (The above annual emission limitation is based upon a rolling, 12-month summation.)
	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	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 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

None

### 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 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.

### IV. Reporting Requirements

1. 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 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.
2. 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. These quarterly reports shall be submitted in accordance with paragraph A.1.c., Part I-General Terms and Conditions, of this permit.
3. The permittee shall submit annual reports that specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance Method:

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-  
0.05 lb VOC/gallon of 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 content 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.

- 1.b Emission limitation-  
2.2 lbs VOC/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.

**V. Testing Requirements (continued)**

**1.c** Emission Limitation-  
34.8 lbs/day VOC

Applicable Compliance Method-

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

**1.d** Emission Limitation-  
5.22 tons VOC/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.

**VI. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** See Attached File: MORAPPXB.DOC

#### 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>
topcoat system (See A.I.2.a.)	OAC rule 3745-31-05(A)(3) PTI # 08-2506	0.99 kg of volatile organic compounds (VOC)/liter of coating solids applied or 8.24 lbs VOC/gallon of coating solids deposited
		305 lbs/hr, 4913.76 lbs/day, 737.06 tons/yr VOC, 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.)
		19.71 tons/yr particulate emissions(PE)
		See A.I.2.b - A.I.2.f.
	OAC rule 3745-21-09(C)(1)(c)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 and 3745-17-07(A). 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	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)	4.5 lbs/hr particulate emissions(PE)

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a 6-minute average, except as provided by rule.

## 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 concentration outlet 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 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** The clearcoat areas, demasking areas and the four bake ovens associated with this coating line shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR, Part 51, Appendix M, Method 204.

## 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.
- 2. The average 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, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units was in compliance.
- 3. The PTE shall meet the following criteria:
  - a. any "Natural Draft Opening" (NDO)\* shall be at least 4 equivalent diameters from each VOC emission point;
  - b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm), which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
  - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
  - e. all VOC emissions must be captured and vented to the VOC control devices.\*\*

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

## II. Operational Restrictions (continued)

\* Definitions for PTE and NDO:

\*\* Only 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.

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all OC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

The permittee has the option to perform an alternative demonstration to show that the total enclosures cannot be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the total enclosures to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which would affect the total enclosure are opened in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the total enclosure.

If negative pressure within the total enclosures cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operation, restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the total enclosures.

If the permittee elects not to perform the alternative demonstration specified in this section to show that the total enclosures cannot be compromised or the additional demonstration indicates that the total enclosures cannot be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the total enclosures.

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

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The VOC usage rate (uncontrolled) and VOC emission rate (controlled) [see calculation methodology in Section III.2 below], in tons. [The monthly VOC emission and usage rates shall be calculated by summing the daily VOC emission and usage rates (from Section III.2. below) for the calendar month.]
  - b. The rolling, 12-month summation of the monthly VOC usage rates (uncontrolled), in tons.
  - c. The rolling, 12-month summation of the monthly VOC emission rates (controlled), in tons.

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

2. 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 and record each day the following information for this emissions unit:

- a. 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 [the most recent emission testing was conducted on 12/12/94 and 12/13/94].
  - b. The total VOC emission rate, in pounds.
  - c. The number of hours the emissions unit was in operation.
  - d. The average hourly VOC emission rate (b/c), in pounds/hour average.
3. 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. 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.
  4. 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.
  5. The permittee shall operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases entering and leaving the VOC concentrator when the emissions unit is in operation and venting the VOC emissions to the fume concentrator. The organic monitoring devices and recorders shall be capable of satisfying the performance requirements specified in 40 CFR, Part 60, Appendix B, Performance Specification 8. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall maintain records of all inlet and outlet data obtained by the continuous VOC monitoring system including, but not limited to, parts per million VOC on an instantaneous (one-minute) basis, the average emissions of VOC for each 3-hour block of time, in ppm and pounds/day, the average VOC removal efficiency for each 3-hour block of time, the total emissions of VOC for each day (in pounds/day), the results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

A statement of certification of the existing continuous volatile organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

6. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous volatile organic compound monitoring system designed to ensure continuous valid and representative readings of volatile organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous volatile organic compound monitoring system must be kept on site and available for inspection during regular office hours.
7. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously and continuously measure and record the pressure inside and outside of each of the total enclosures. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
8. The permittee shall record the average difference in pressure between each of the total enclosures and the surrounding areas, in inches of water, for each 3-hour block of time the emissions unit is in operation.
9. The permittee shall document whether or not the water wash was in service when the emissions unit was in operation.

### IV. Reporting Requirements

1. 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 hourly VOC emission limitation of 35 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;
  - f. all 3-hour blocks of time when the VOC concentrator removal efficiency was less than 90% and the VOC outlet concentration was greater than 10 ppm (as propane); and
  - g. all periods of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inch of water.

These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the total VOC emissions and usage rates for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. 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.
4. 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.

#### IV. Reporting Requirements (continued)

5. The permittee shall notify the Director (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 District Office or local air agency) within 30 days after the event occurs.

#### V. Testing Requirements

##### 1. Compliance Methods-

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:

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.

##### 1.b Emission Limitation - 305 lbs/hr VOC

Applicable Compliance Method -

Compliance with the hourly allowable VOC emission limitation above shall be based upon the results of emission testing conducted in accordance with the test methods specified in OAC rule 3745-21-10 and shall also be based on the record keeping requirements in Section A.III.2 of this permit.

##### 1.c Emission Limitation - 4913.76 lbs/day VOC

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.2 of this permit.

##### 1.d Emission Limitation - 737.06 tons/yr VOC, 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.1 and 2 of this permit.

##### 1.e Emission Limitation - 4.5 lbs/hr PE

Applicable Compliance Method -

To determine the actual worst case emissions rate for PE, the following equation may be used:

$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1 - TE) \times (1 - CE)$

E = PE rate, in pounds per hour

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

CE = control efficiency of the control equipment

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

**V. Testing Requirements (continued)**

- 1.f** Emission Limitation -  
19.71 tons/yr PE

Applicable Compliance Method -

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.

- 1.g** Emission Limitation-  
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).

- 1.h** 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.

- 1.i** 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.

- 1.j** 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.

- 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 within 6 months after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 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.

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.

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

The following test method shall be employed to demonstrate compliance with removal/destruction efficiency requirements and the mass emission limitation for VOC: 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 fume 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 vapor control system. The control efficiencies of the fume 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 OAC rule 3745-21-10. 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.

Not later than 30 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.

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.

## **VI. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** Deadner (K024)

**Activity Description:** See Attached File: MORAPPXB.DOC

#### 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>
deadner system, with dry filtration system	OAC rule 3745-31-05(A)(3) PTI # 08-2506	0.12 lb of volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
		2.7 lbs/hr, 43.04 lbs/day, 6.46 tons/yr of VOC, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]
		3.13 tons/yr of particulate emissions(PE)
		(The above tons/yr emission limitations are based on rolling, 12-month summations.)
	OAC rule 3745-17-11(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 and 3745-17-07(A). 1.3 lbs/hr of PE
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-09(U)(1)(c)	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).

## 2. Additional Terms and Conditions

- 2.a The 2.7 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.
- 2.b The permittee shall employ a dry exhaust filtration system while this emissions unit is in operation.

## II. Operational Restrictions

None

## 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 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 VOC emission rate for all the coatings, i.e., (d/e), in pounds/day (average).
  - g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.
- 2. The permittee shall maintain a log of all the times, while this emissions unit was in operation, during which the dry exhaust gas filtration system was not functioning.

## IV. Reporting Requirements

- 1. 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 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 45 days following the end of the calendar month.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 6.46 tons and of the daily VOC emission limitation of 43.04 pounds. The quarterly reports shall be submitted in accordance with paragraph A.1.c. of Part I, of the General Terms and Conditions of this permit.
- 3. The permittee shall submit annual reports that specify the total volatile organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

- 1. Compliance Method-

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-  
0.12 lb VOC/gallon of 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, 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.

- 1.b** Emission limitation-  
2.7 lbs VOC/hr

Applicable Compliance Method-

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

- 1.c** Emission Limitation-  
43.04 lbs/day VOC

Applicable Compliance Method-

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

- 1.d** Emission Limitation-  
6.46 tons VOC/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.

- 1.e** Emission Limitation-  
1.3 lbs/hr PE

Applicable Compliance Method-

To determine the actual worst case emissions rate for PE, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour} \times (1-TE) \times (1-CE)$$

E = PE rate, in pounds per hour

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

CE = control efficiency of the control equipment

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

- 1.f** Emission Limitation-  
5.69 tons/yr PE

Applicable Compliance Method-

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.

## **VI. Miscellaneous Requirements**

1. Upon transfer of production to the new deadner/windshield prime (emissions unit K031), the existing deadner line (emissions unit K024) shall be permanently shut down and removed from the permit system.
2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** Final Repair (K025)

**Activity Description:** See Attached File: MORAPPXB.DOC

#### 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>
final repair system	OAC rule 3745-31-05(A)(3) PTI # 08-2506	23 lbs/hr, 88.81 lbs/day and 13.32 tons/yr* volatile organic compounds (VOC), 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  3.11 tons/yr particulate emissions(PE)  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).
	OAC rule 3745-21-09(C)(1)(d)	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)	0.71 lb/hr PE
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

- 2.a The 23 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

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 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 number of gallons, excluding water and exempt solvents, of each coating employed.
  - d. 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.
  - e. The total VOC emissions from all the coatings employed, in pounds [summation of (b x c) for all coatings].
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The total VOC emissions from all the coatings employed (calculated by summing the daily VOC emission rates (from Section 1.e above) for the calendar month, divided by 2000), in tons.
  - b. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

## IV. Reporting Requirements

1. 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.
2. 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 13.3 tons.

All quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## V. Testing Requirements

1. Compliance Methods

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-  
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.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, 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.

- 1.b** Emission limitation-  
23 lbs VOC/hr

Applicable Compliance Method-

Compliance may be determined by multiplying a company-derived VOC emission factor of 0.7656 lb/unit by the maximum hourly number of units (30 units/hr).

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

- 1.c** Emission Limitation-  
13.32 tons VOC/yr, as a rolling, 12-month summation

Applicable Compliance Method-

Compliance shall be based upon the record keeping specified in Sections A.III.1 and 2 of this permit.

- 1.d** Emission limitation-  
88.81 lbs VOC/day

Applicable Compliance Method-

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

- 1.e** Emission Limitation-  
3.11 tons/yr PE

Applicable Compliance Method-

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.

- 1.f** Emission Limitation-  
0.71 lb/hr PE

Applicable Compliance Method:

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

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

$$E = \text{PE rate (lbs/hr)}$$

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

CE = control efficiency of the control equipment.

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

**V. Testing Requirements (continued)**

- 1.g** Emission Limitation-  
Visible emissions 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).

**VI. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** See Attached File: MORAPPXB.DOC

#### 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>
miscellaneous sealers & adhesives (plant-wide usage)	OAC rule 3745-31-05(A)(3) PTI # 08-2506	348 lbs/day, 52.20 tons/yr* volatile organic compounds (VOC), 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 requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(g).  * based on a rolling, 12-month summation
	OAC rule 3745-21-09(U)(1)(g)	4.9 lbs VOC/gallons of coating, excluding water and exempt solvent

##### 2. Additional Terms and Conditions

- 2.a The 348 lbs/day 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

None

### 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 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 (bxc) for all coatings), in pounds.
  - e. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

### 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 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.
2. The permittee shall submit quarterly deviation (excursion) reports reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 52.2 tons. All quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance Methods:

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-  
348 lbs VOC/day

Applicable Compliance Method-  
Compliance with the daily allowable VOC emission limitation shall be determined by multiplying the maximum number of truck frames processed (number of truck frames processed/day) by a maximum company-derived emission factor of 0.30 lb VOC/truck frame processed.

- 1.b Emission Limitation-  
52.20 tons VOC/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.

- 1.c Emission Limitation-  
4.9 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, 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.

## **VI. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** See Attached File: MORAPPXB.DOC

#### 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>
miscellaneous solvent usage/cleanup (flushing, wiping & brushing, floor cleaning, paint purging, booth cleaning, windshield cleaning, body wiping)	OAC rule 3745-31-05(A)(3) PTI #08-2506	629.0 tons/yr organic compounds (OC), based on a rolling, 12-month summation  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

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

1. 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. Documentation on whether or not each solvent material employed is a photochemically reactive material.

### IV. Reporting Requirements

1. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 629 tons. All quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.
3. 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.

### V. Testing Requirements

1. Compliance Methods

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-  
629 tons VOC/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.

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

## **VI. Miscellaneous Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** See Attached File: MORAPPXB01.DOC (Revised document)

#### 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>
electrocoating dip tank w/ natural gas fired oven (ELPO) controlled with a thermal oxidizer	OAC rule 3745-31-05(A)(3) PTI #08-3527	12.21 lbs/hr, 28.34 tons/yr* volatile organic compounds (VOC), not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]
		See Sections A.1.2.a through c. from natural gas combustion: 25.6 tons/yr* nitrogen oxides (NOx) 21.50 tons/yr* carbon monoxide (CO)
	OAC rule 3745-21-09(C)(1)(a)(i)	* based on a rolling, 12-month summation 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) [see Section A.1.2.e].
	40 CFR, Part 60, Subpart MM	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) [see Section A.1.2.f].

\*\* Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.

## **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 daily, volume-weighted average, excluding water and exempt solvents, before the application of emission controls. To ensure compliance with this VOC content limitation, the coating materials added to the dip tank on a daily basis shall meet a VOC content limitation of 0.74 pound per gallon of coating materials, as a volume-weighted average, excluding water and exempt solvents.
- 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 0.83 pound VOC/gallon of applied coating solids, as a monthly, volume-weighted average, before the application of emission controls. To ensure compliance with this VOC content limitation, the coating materials added to the dip tank on a monthly basis shall meet a VOC content limitation of 0.10 kg VOC/liter of applied coating solids, or 0.83 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** Since natural gas is the only fuel fired in this emissions unit, no SO<sub>2</sub> emission limitation is established by OAC Chapter 3745-18 for this emissions unit.
- 2.e** Compliance with this rule, which specifies a VOC content limitation of 1.2 lbs/gallon of coating excluding water and exempt solvents, or if a control system is employed, 1.4 lbs/gallon of solids, is demonstrated by compliance with the emission and control requirements established pursuant to OAC rule 3745-31-05.
- 2.f** Compliance with this rule, which specifies a VOC content limitation of 0.17 kg/liter of applied solids, is demonstrated by compliance with the emission and control requirements established pursuant to OAC rule 3745-31-05.

## **II. Operational Restrictions**

- 1.** 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.
- 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.
- 3.** All VOC emissions shall be captured and contained for discharge through the thermal oxidizer and through stacks or egress points that allow for accurate measurement of the total VOC emission rate.

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

1. The permittee shall collect and record the following information for each day 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. 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.
  - j. 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.
  - k. The direction of air flow through the natural draft openings shall be documented once per shift based upon visual inspections of the streamers, i.e., into or out of the enclosure.
2. 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.
  - c. The calculated, controlled, rolling, 12-month VOC emission rate, in tons (see Section A.V.1.d).
  - d. The monthly, volume-weighted average VOC content of the combination of materials added to the dip tank, in lbs VOC/gallon of applied solids (see Section A.V.1.b).
3. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the temperature within the combustion chamber of the regenerative thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The continuous monitoring and recording devices shall be capable of accurately measuring the temperature, and the owner or operator shall properly operate and maintain the devices in accordance with manufacturer's recommendations.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA Office or local air agency) in writing of any daily 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.
2. The permittee shall submit annual reports that specify the total VOC emissions and natural gas usage from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **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 reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

4. The permittee shall notify the Director (the appropriate Ohio EPA Office or local air agency) in writing of any monthly record showing the use of any noncomplying coating material [i.e., for VOC content ( 0.83 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.

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

1. Compliance Method:

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-  
0.74 lb VOC/gallon of coating, excluding water and exempt solvents, before the application of emission controls

Applicable Compliance Method-

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

## V. Testing Requirements (continued)

**1.b** Emission Limitation-  
0.83 lb VOC/gallon of applied coating solids, before the application of emission control

Applicable Compliance Method-

The calculated monthly, volume-weighted average VOC content 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.1, 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.1.
  - (b) Determine the monthly VOC emissions, in pounds, by summing the daily VOC emission rates (from Section 1.b.ii(a) above) for the calendar month.
- iii. Divide 1.b.ii by 1.b.i to determine the monthly, volume-weighted average VOC content, in pounds per gallon of applied solids of the combination of materials added to the dip tank.

**1.c** Emission Limitation-  
12.21 lbs/hr VOC

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation shall also be based upon the results of emission testing conducted in accordance with the test methods and procedures outlined in Section A.V.3. of this permit.

**1.d** Emission Limitation-  
28.34 tons/yr of VOC, 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.1.
  - (b) Determine the monthly VOC emissions, in tons, by summing the daily VOC emission rates (from Section 1.b.ii(a) above) for the calendar month and then dividing by 2000.
- 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.

**1.e** Emission Limitations-  
25.6 tons/yr NO<sub>x</sub>; 21.50 tons/yr CO, 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. 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.

## V. Testing Requirements (continued)

- 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.

2. USEPA Method 24 shall be used to determine the VOC contents of the coating in the electrodeposition system. 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 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.
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 within 6 months after permit issuance and within 6 months prior to permit expiration.
  - 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 dip tank 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 and the north and south oven exhaust). The VOC measurements shall be in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C).
    - 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:

## V. Testing Requirements (continued)

$(\text{VOCm NO exhaust} + \text{VOCm SO exhaust} / \text{VOCm NO exhaust} + \text{VOCm SO exhaust} + \text{VOCm DT exhaust} + \text{VOCm RE}) \times 100\%$

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 OAC rule 3745-21-10(c).

Not later than 30 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.

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.

## VI. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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 (temporary location) (K030)  
**Activity Description:** See Attached File MORAPPXB01.DOC

#### 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>
windshield glass system	OAC rule 3745-31-03(A)(3) PTI # 08-3719	117.8 lbs/day, 16.53 tons/yr* volatile organic compounds (VOC), excluding cleanup  * based on a rolling, 12-month summation  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(9)(g).  See Section A.I.2.a.
	OAC rule 3745-21-07(G)(9)(g)	

##### 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.

##### II. Operational Restrictions

**None**

### 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 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).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 6.53 tons and the daily VOC emission limitation of 117.8 pounds. The quarterly reports shall be submitted in accordance with paragraph A.1.c., Paragraph Part I-General Terms and Conditions.
2. 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.
3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

### V. Testing Requirements

#### 1. Compliance Method

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- 117.8 lbs VOC/day, excluding cleanup

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

#### 1.b Emission Limitation- 16.53 tons VOC/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.

#### 1.c VOC content Limitations: 7.3 lbs VOC/gallon of coating (clear prime) 5.1 lbs VOC/gallon of coating (black prime) 6.08 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.

**V. Testing Requirements (continued)**

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, 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.

**VI. Miscellaneous Requirements**

1. Upon the transfer of production to the interim windshield glass system (emissions unit K030), the existing windshield glass system, which is currently part of the sealer and adhesive group (emissions unit K027), shall be permanently shut down.
2. Upon transfer of production to the new windshield glass system (emissions unit K031), the interim windshield glass system (emissions unit K030), shall be permanently shut down.
3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping requirements, reporting and testing requirements contained in Permit to Install #08-3719, issued on 03/25/98; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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 Sanding Booth (P003)

**Activity Description:** See Attached File: MORAPPXB.DOC

#### 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>
topcoat sanding booth	OAC rule 3745-31-05(A)(3) PTI # 08-2506	1.65 tons/yr of particulate emissions (PE)  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11 and 3745-17-07(A).
	OAC rule 3745-17-11(B)	0.551 lb/hr of PE
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a 6-minute average, except as provided by rule.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The annual number of hours of operation for this emissions unit shall not exceed 6000.

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

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

#### **IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit annual reports that summarize the annual actual number of hours the emissions unit was in operation for the previous calendar year. These reports shall be submitted by January of 31st of each year.

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

1. Compliance Methods:

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 Emission Limitation-  
0.551 lb/hr of particulates

Applicable Compliance Method-

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

- 1.b Emission Limitation-  
1.65 tons/yr of particulates

Applicable Compliance Method-

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 6000, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- 1.c Emission Limitation-  
Opacity shall not exceed 20 percent, as a 6-minute average, except as provided by rule.

Applicable Compliance Method-

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

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

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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:** Tank #10 - Windshield Washer Solvent (T010)  
**Activity Description:** See Attached File: MORAPPA.DOC

#### 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>
windshield washer solvent storage tank: one 8,500-gallon, above-ground storage tank	OAC rule 3745-31-05(A)(3) PTI # 08-2506	0.15 ton/yr* organic compounds (OC)  * based on a rolling, 12-month summation  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(D)(2). See Section A.II.2.
	OAC rule 3745-21-07(D)(2)	

##### 2. Additional Terms and Conditions

- 2.a The OC content of each solvent employed in this emissions unit shall not exceed 0.0014 lb/gallon.

##### II. Operational Restrictions

1. The maximum solvent throughput rate for this emissions unit shall not exceed 213,085 gallons, based upon a rolling, 12-month summation of the monthly solvent usage rates.
2. This emissions unit shall be equipped with a permanent submerged fill pipe.

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

1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The solvent throughput rate, in gallons.
  - b. The rolling, 12-month summation of the monthly solvent throughput rates, in gallons.
  - c. The OC emissions, in tons, calculated by multiplying the monthly solvent throughput rate (in gallons, from Section 1.a above) by a company-supplied emission factor of 0.0014 lb OC/gallon, and then dividing by 2000.
  - d. The rolling, 12-month summation of the monthly OC emission rates, in tons.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month solvent throughput restriction of 213,085 gallons and the rolling, 12-month OC emission limitation of 0.15 ton. The quarterly reports shall be submitted in accordance with Paragraph A.1.c., Part I-General Terms and Conditions.

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

1. Compliance Method

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-  
0.15 ton/yr OC, as a rolling, 12-month summation

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

- 1.b Throughput Restriction:  
213,085 gallons

Applicable Compliance Method:  
Compliance shall be based on the record keeping requirement specified in Section A.III.1 of this permit.

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

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and recording keeping, reporting and testing requirements are as stringent or more stringent than the monitoring and record keeping, reporting and testing requirements contained in Permit to Install #08-2506, issued on 10/23/92 and subsequently modified on 8/9/95, 11/22/95 and 11/12/97; A.III, IV and V. The monitoring and record keeping, reporting and testing requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping, reporting and testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping, reporting and testing requirements in the Permit to Install.

**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>
---	---	--

**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

\*\*\*\*\*

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

\*\*\*\*\*