

Facility ID: 0857101349 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

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

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

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

Z014 - solvent cold cleaners
Z023 - emergency diesel generators

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

4. Operation Restrictions-

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

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

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

5. Monitoring and/or Record Keeping Requirements-

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

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

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

6. Reporting Requirements-

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

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

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

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

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b State Only Enforceable Section

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

P001- EDP sanding booth
P002- Guidecoat and minor topcoat sanding booth
P003- Topcoat Sanding Booth
P004- Final repair sanding
T006- Tank #6 engine oil
T007- Tank #7 auto transmission fluid
T008- Tank #8 anti-freeze
T009- Tank #9 anti-freeze
T010- tank #10 windshield washer solvent
T011- Tank #11 axle lube
T012- Tank #12 power steering fluid
T013- Tank #13 diesel fuel
Z010- Roll Test
Z011- Laboratory equipment and laboratory fume hoods
Z012- Compression and Injection plastic molding equipment
Z013- Non-continuous solvent recycling units
Z015- Grinding, machining and abrasive pneumatic conveying
Z016- Maintenance welding
Z017- Arc welding
Z018- Resistance spot welding
Z019- Multi-stage phosphate system
Z020- Feather dusters
Z021- Vehicle washers prior to shipping
Z022- Bulk storage material transferring equipment
Z024- High pressure water cleaning equipment
Z025- Vehicle fluid fill operations
Z026- Miscellaneous aerosol spray cans
Z027- Mechanical repair stalls
Z028- Mobile equipment battery charging areas
Z029- Engine subassembly line
Z030- Radiator subassembly line
Z031- Trim assembly line
Z032- Gasoline tank assembly area
Z033- Material storage
Z034- Paint pump repair shop
Z035- Wet/dry sanding booths
Z036- Leak test areas
Z037- Parts washer and rinse tanks using detergent cleaners
Z038- Storage tanks for inorganic liquids including water
Z039- Pressurized storage tanks for propane, butane and LPG
Z040- Storage tanks for liquids(<700 gallons)
Z041- Cleanup activities-onsite removal or removal action
Z042- Maintenance of interior/exterior building structures
Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.
Z043- Gasoline dispensing facilities
Z044- Pre-washers
Z045- Spot sanding and painting

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857101349 Emissions Unit ID: B001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

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

2. Additional Terms and Conditions

- 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).

- 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.
- 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.
- 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).
- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 08-2506.

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II. Operational Restrictions

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

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

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III. Monitoring and/or Record Keeping Requirements

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

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

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

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

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IV. Reporting Requirements

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

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

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

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

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

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

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

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

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

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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:

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

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

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

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

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

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

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

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

- c. Emission Limitation -
The NO_x emissions from this emissions unit shall not exceed 135.58 tons/yr, as a rolling, 12-month summation.

Applicable Compliance Method -
Compliance with the annual allowable NO_x 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_x 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_x/mm cu. ft*, and then dividing by 2000 lbs/ton).

* The company-derived emission factor was based upon a natural gas ratio between process and thermal oxidizer abatement of 4.88 to 1.0 (or 83% to 17%) and the respective emission factors of 100 lbs NO_x/mm cu. ft. for the process [(AP-42, Chapter 1.4 (revised 7/98)] and 450 lbs NO_x/mm cu. ft. for the thermal oxidizer (company-derived)].

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

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

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

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

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

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

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

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

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

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

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VI. **Miscellaneous Requirements**

- 1. None

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B. State Enforceable Section

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

- 1. None.

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			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: G001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

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

2. Additional Terms and Conditions

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

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II. Operational Restrictions

- 1. The permittee shall comply with the following operational restrictions for the Stage I vapor control system:
 - a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.
 - b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
 - c. There shall be no leaks in the vapor lines or liquid lines during the transfer of gasoline.

- d. The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. Each submerged fill pipe shall be installed so it is within six (6) inches of the bottom of the storage tank.
 - e. All fill caps shall be "in place" and clamped during normal storage conditions.
 - f. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system which is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

[Authority for Term: OAC rule 3745-77-07(A)(1)]
2. The gasoline throughput for this emissions unit shall not exceed 2,000,000 gallons, based upon a rolling, 12-month summation.

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

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III. Monitoring and/or Record Keeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- 2. The permittee shall maintain records of the gasoline throughput during each calendar month and during each rolling, 12-month period.

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

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IV. Reporting Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month gasoline throughput limitation of 2,000,000 gallons.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- 3. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

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

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

Applicable Compliance Method-

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

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

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

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

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

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: G001 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

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			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101349 Emissions Unit ID: K020 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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

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II. **Operational Restrictions**

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

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

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III. Monitoring and/or Record Keeping Requirements

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

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

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

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

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IV. Reporting Requirements

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

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

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

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

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

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

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

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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:

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

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

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

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

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

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

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

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

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

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

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

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

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K020 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

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			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K022 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

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

2. Additional Terms and Conditions

- a. The 2.2 lbs/hr VOC limitation was established for PTI purposes to reflect the potential to emit for this

emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

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II. Operational Restrictions

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

63.3094(b) work practice requirements (plan)
2. The permittee shall employ only powder coatings in this emissions unit.

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

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III. Monitoring and/or Record Keeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:

63.3130(a) notification and reports verifying compliance
63.3130(b) information provided by suppliers or manufacturers
63.3130(c)(1) required information for each coating used
63.3130(c)(2) required information for each thinner used
63.3130(c)(4) and (5) record of the of the organic HAP emission rates
63.3130(c)(6)(i) and (ii) average mass organic HAP content
63.3130(d) through (h) required overall records that should be maintained
63.3130(m) transfer efficiency records
63.3130(n) record of the work practice plan
3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (in lbs/gallon, excluding water and exempt solvents), as applied.
 - c. The number of gallons of each coating (excluding water and exempt solvents) employed.
 - d. The total VOC emissions from all the coatings employed (summation of (bxc) for all coatings), in pounds.
 - e. The number of days the emissions unit was in operation.
 - f. The average daily OC emission rate for all the coatings employed, i.e., (d/e), in pounds/day (average).
 - g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.
[Authority for Term: OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

63.3120(a)(1) - (9) semiannual compliance reports
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling,12-month VOC emission limitation of 5.22 tons and of the daily VOC emission limitation of 34.8

pounds.

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

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

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

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

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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:

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

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

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

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

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

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

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

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

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

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101349 Emissions Unit ID: K022 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

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		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0857101349 Emissions Unit ID: K023 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K023- topcoat system (See A.I.2.a.)	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The VOC content shall not exceed 0.99 kg of volatile organic compounds (VOC)/liter of coating solids

applied or 8.24 lbs VOC/gallon of coating solids deposited.

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 4913.76 lbs/day and 737.06 tons/yr, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]

(The above tons/yr emission limitation is a rolling, 12-month summation.)

See A.I.2.b - A.I.2.e.

The particulate emissions (PE) emissions from this emissions unit shall not exceed 19.71 tons/yr. See A.I.2.f.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A), 40 CFR Part 63, Subpart A and Subpart III.

OAC rule 3745-21-09(C)(1)(c)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

40 CFR Part 60, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations)

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11(B)

The particulate emissions (PE) emissions from this emissions unit shall not exceed 4.5 lbs/hr. See A.I.2.f.

OAC rule 3745-17-07(A)

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

40 CFR Part 63, Subpart III (Surface Coating of Automobiles and Light-Duty Truck)

See 40 CFR Part 63.3091(b)

40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions

1.10 pounds of HAPs per gallon of coating solids deposited

40 CFR Part 64 Compliance Assurance Monitoring (CAM)

63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

See Sections A.III.2, 3, 7, 8, 9, 11, 12, 13 and 15, A.IV.2.e, 3, 4, 5 and 7.

2. Additional Terms and Conditions

- 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.
- 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.
- c. The VOC concentrator shall operate at a minimum VOC removal efficiency of 90 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.
- 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.
- e. The clearcoat bake oven thermal oxidizers, shall each operate at a minimum VOC destruction efficiency of 90 percent, by weight, or a maximum outlet concentration of 10 ppm, as propane.
- f. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.

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II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(A)(1)]
2. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart IIII, including the following section:

63.3094(b) work practice requirements (plan)

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III. Monitoring and/or Record Keeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The average combustion temperature within each of the thermal oxidizers referenced in Sections A.I.2.d and A.I.2.e for each 3-hour block of time when the emissions unit is in operation and vehicles are being painted, shall not be more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emissions test that demonstrated the emissions units was in compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
3. The permittee shall operate a VOC concentrator wheel, when this emissions unit is in operation, as follows:
 - a. The VOC concentrator wheel shall have an initial stationary layer of carbon.
 - b. The number of revolutions per hour (RPH) of the VOC concentrator wheel shall be continuously maintained at a value within +/-1 RPH of the value established during the most recent emissions test that demonstrated the emissions unit was in compliance. Exception monitoring of the rotation (motion sensing) shall alarm in the paint shop maintenance dispatch area. [The variable frequency drive (VFD) reading of the VOC concentrator wheel established during the most recent emission testing that demonstrated compliance, conducted on 11/19/2002, was 35 Hz which equates to 3.4 RPH.]
 - c. The VOC concentrator wheel shall have an operating desorption fan.
 - d. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3 hour block of time, shall be maintained within the range of 200 to 280 degrees Fahrenheit.
[Authority for Term: OAC rule 3745-77-07(C)(1)]
4. The permittee shall operate the water wash when this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
5. 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.6 below], in tons. [The monthly VOC emission and usage rates shall be calculated in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, Dec.1988).]
 - 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.
[Authority for Term: OAC rule 3745-77-07(C)(1)]
6. The permittee shall maintain records of the topcoat operation that will enable the calculation of the VOC emission rate from this emissions unit in accordance with the U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, Dec.1988).

The permittee shall calculate the VOC emission rate from all the coatings employed in the topcoat operation, in pounds of VOC per gallon of deposited solids, using the overall capture and control efficiency for the control equipment, as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
7. The permittee shall operate and maintain continuous temperatures monitors and recorders that measure and record the combustion temperature within each of the thermal oxidizers when the emissions unit is in operation. For each thermal oxidizer, the permittee shall utilize a continuous strip chart recorder. If the strip chart malfunctions, the permittee shall utilize a computer system that records the temperatures every second and at the end of the day prints out the high, low and average temperatures for the day. Units shall

be in degrees Fahrenheit. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameters and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturers' recommendations, with any modifications deemed necessary by the permittee.

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

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

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

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

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

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

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

11. The permittee shall operate and maintain the following sensors, monitors and recorders associated with the VOC concentrator wheel when this emissions unit is in operation:

- a. A motion sensor that will detect rotation of the VOC concentrator wheel. The sensor shall be connected to a system alarm that will notify the appropriate personnel that motion is not detected.
- b. An operation sensor that will detect operation of the desorption fan, which controls air flow through the VOC concentrator wheel. The sensor shall be connected to a system alarm that will notify the appropriate personnel when the fan is not in operation.
- c. A continuous temperature monitor and recorder that measures and records the temperature of the desorption air stream prior to the VOC concentrator wheel.

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

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

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

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

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

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

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

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

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

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

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

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IV. **Reporting Requirements**

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the VOC content limitations of 0.99 kg VOC / liter of deposited coating solids (8.24 lbs VOC / gallon of deposited coating solids);
 - b. the daily VOC emission limitation of 4913.76 pounds;
 - c. the rolling, 12-month VOC usage rate restriction of 1302.89 tons;
 - d. the rolling, 12-month VOC emission limitation of 737.06 tons;
 - e. all 3-hour blocks of time during which the average combustion temperature within each of the thermal oxidizers was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
3. The permittee shall submit quarterly deviation (excursion) reports, that include the following information for the VOC wheel concentrator associated with this emissions unit:
 - a. An identification of all time periods during which the VOC wheel concentrator motion sensor and/or the desorption fan operation sensor alarms were activated and the process operation continued, when the emissions unit was in operation.
 - b. An identification of all 3 hour blocks of time during which the average temperature of the desorption air stream prior to the VOC wheel concentrator wheel did not comply with the temperature limitation specified in Section A.II of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
4. The permittee shall submit written reports that (a) identify each instance during which the manual check of the actual rotational speed of the concentrator (RPH) did not indicate compliance with the value established in Section A.III of this permit and/or did not correspond to 3.4 RPH for every 35 HZ and (b) describe any corrective actions taken to reestablish the proper concentrator rotational speed (RPH). These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the event occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
5. The permittee shall submit an annual report covering the inspection of the initial stationary layer of carbon in the VOC concentrator specified in Section A.III. of this permit. The report shall be submitted by February 15 of each year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
6. By February 15 of each year, and in accordance with Section 18 of the U.S. EPA's "Protocol for determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-028, December 1988), the permittee shall review the operating conditions and evaluate that the Transfer Efficiency is representative of the most recent test. A statement of this review must be kept on file at the site.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
7. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control devices and/or monitoring equipment when the associated emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
8. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing that the water wash was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
9. The quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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

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

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

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

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

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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:

a. Emission Limitation:

The VOC content shall not exceed 0.99 kg VOC/liter of deposited coating solids (8.24 lbs VOC/gallon deposited coating solids), after controls.

Applicable Compliance Method -

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

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

b. Emission Limitation -

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

Applicable Compliance Method -

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

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

c. Emission Limitation -

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

Applicable Compliance Method -

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

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

d. Emission Limitation -

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

Applicable Compliance Method -

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

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

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

e. Emission Limitation -

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

Applicable Compliance Method -

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

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

f. Emission Limitation-

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

Applicable Compliance Method-

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

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

g. Emission Limitation-

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

Applicable Compliance Method-

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

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

h. Emission Limitation-

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

Applicable Compliance Method-

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

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

i. Emission Limitations-

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

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

Applicable Compliance Method-

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

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

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

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

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

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

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

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

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

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the RAPCA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the RAPCA's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the RAPCA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted,

with prior approval from the RAPCA.

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101349 Emissions Unit ID: K023 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

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		
K023- topcoat system	OAC rule 3745-17-11(C)	See B.I.2.
2. The permittee shall operate the waterwash control system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The waterwash system shall be employed during all periods of coating application to control particulate emissions.		

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II. **Operational Restrictions**

1. None

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

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

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

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

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

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IV. Reporting Requirements

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

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0857101349 Emissions Unit ID: K025 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

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>
K025- final repair system	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 88.81 lbs/day and 13.32 tons/yr*, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028].
		* based on a rolling, 12-month summation
		The particulate emissions (PE) from this emissions unit shall not exceed 3.10 tons/yr.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1)(d), 3745-17-11(B) and 3745-17-07(A) 40 CFR Part 63, Subpart A and Subpart IIII.
	OAC rule 3745-21-09(C)(1)(d)	The VOC content shall not exceed 4.8 lbs of VOC per

OAC rule 3745-17-11(B)(1)	gallon of coating, excluding water and exempt solvents (as a daily, volume-weighted average) The PE from this emissions unit shall not exceed 0.71 lb/hr. See A.I.2.a.
OAC rule 3745-17-07(A)	The visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
40 CFR Part 63, Subpart III (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3091(b) 1.10 pounds of HAPs per gallon of coating solids deposited
40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

2. **Additional Terms and Conditions**

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

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II. **Operational Restrictions**

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

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

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

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

- 2. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The number of gallons, excluding water and exempt solvents, of each coating employed.
 - b. 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.
 - c. The total VOC emissions from all the coatings employed, in pounds [summation of (2.b x 1.a) for all coatings].

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

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

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

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

- 4. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart III, including the following sections:
63.3130(a) notification and reports verifying compliance
63.3130(b) information provided by suppliers or manufacturers
63.3130(c)(1) required information for each coating used
63.3130(c)(2) required information for each thinner used
63.3130(c)(4) and (5) record of the of the organic HAP emission rates

- 63.3130(c)(6)(i) and (ii) average mass organic HAP content
- 63.3130(d) through (h) required overall records that should be maintained
- 63.3130(m) transfer efficiency records
- 63.3130(n) record of the work practice plan

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IV. Reporting Requirements

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

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

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

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

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

- a. all exceedances of the daily VOC emission limitation of 88.81 pounds; and
- b. all exceedances of the rolling, 12-month VOC emission limitation of 13.32 tons.

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

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

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

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

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

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

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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:

- a. Emission Limitation-

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

Applicable Compliance Method:

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

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

- b. Emission limitation-

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

Applicable Compliance Method-

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

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

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- d. Emission Limitation-
The PE from this emissions unit shall not exceed 0.71 lb/hr.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- e. Emission Limitation-
The PE from this emissions unit shall not exceed 3.10 tons/yr.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- f. Emission Limitation-
The visible PE shall not exceed 20% opacity, as a six-minute average

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

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

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K025 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

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

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

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

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K027 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

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>
K027- miscellaneous sealers & adhesives (plant-wide usage)	OAC rule 3745-31-05(A)(3) PTI # 08-2506	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 17.0 lbs/hr and 37.58 tons/yr*, not including cleanup materials [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.]
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1) (i) and 40 CFR Part 63, Subpart A and Subpart III.
	OAC rule 3745-21-09(U)(1)(i)	* based on a rolling, 12-month summation The VOC content shall not exceed 3.0 lbs VOC/gallons of coating, excluding water and exempt solvent.

40 CFR Part 63, Subpart III (Surface Coating of Automobiles and Light-Duty Truck)	See 40 CFR Part 63.3091(c) 0.01 pounds of HAPs per pound of adhesive and sealer material
40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions	63.3101 - Table 2 to this subpart shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the permittee.

2. **Additional Terms and Conditions**

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

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II. **Operational Restrictions**

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

63.3094(b) work practice requirements (plan)

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

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

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

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

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

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

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

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IV. **Reporting Requirements**

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

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

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

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

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

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

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

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

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

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

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

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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:

a. Emission limitation-

The VOC emissions from this emissions unit shall not exceed 17.0 lbs/hr.

Applicable Compliance Method-

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

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

b. Emission Limitation-

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

Applicable Compliance Method-

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

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

c. Emission Limitation-

The VOC content shall not exceed 3.0 lbs VOC/gallon coating, excluding water and exempt solvents.

Applicable Compliance Method:

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

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

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

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0857101349 Emissions Unit ID: K027 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

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		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0857101349 Emissions Unit ID: K028 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

- (b) This emissions unit covers miscellaneous solvent usage and cleanup operations used throughout the entire facility.

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II. Operational Restrictions

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

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

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

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

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

63.3094(b) work practice requirements (plan)

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III. Monitoring and/or Record Keeping Requirements

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

with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The permittee shall 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 x (b + c - d - e)], in pounds.
 - h. The total OC emissions from all the solvent materials employed [summation of g for all solvents/2000], in tons.
 - i. The rolling, 12-month summation of the monthly OC emission rates, in tons.
 - j. For only those floor cleaning and body wiping solvents subject to OAC rule 3745-21-07, documentation on whether or not each solvent material employed is a photochemically reactive material.

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

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

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

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IV. Reporting Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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V. **Testing Requirements**

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

Emission Limitation-

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

Applicable Compliance Method-

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

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

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

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101349 Emissions Unit ID: K028 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

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			
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0857101349 Emissions Unit ID: K029 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K029- electrocoating dip tank w/ natural gas-fired oven (ELPO) controlled with a thermal oxidizer	OAC rule 3745-31-05(A)(3) PTI #08-3527	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 12.21 lbs/hr, 28.34 tons/yr, based on a rolling, 12-month summation, not including cleanup materials. [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. The following limits are from natural gas combustion: The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 25.6 tons/yr, based on a rolling, 12-month summation. The carbon oxide (CO) emissions from this emissions unit shall not exceed 21.50 tons/yr based on a rolling, 12-month summation. The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(E) and 3745-21-08(B), 40 CFR Part 63, Subpart A and Subpart III.
	OAC rule 3745-21-09(C)(1)(a)(i)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart MM (Standards of Performance for	The VOC content limitation specified by this rule is less stringent than the VOC content limitation

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

2. Additional Terms and Conditions

- a. The VOC content of the coatings employed in the electrocoating (ELPO) dip tank of this emissions unit shall comply with the VOC content limitation of 0.74 lb/gallon of coating, as a monthly, volume-weighted average, excluding water and exempt solvents, before the application of emission controls.
- b. The coatings employed in the electrocoating (ELPO) dip tank of this emissions unit shall comply with the limitation of 0.10 kg VOC/liter of applied coating solids, or 0.82 pound VOC/gallon of applied coating solids, as a monthly, volume-weighted average, before the application of emission controls.
- 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.
- d. There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for equipment associated with this emissions unit that are not considered "fuel burning equipment" because the process weight rate is less than 1,000 pounds/hour.
- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 08-3527.
- f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- g. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. Operational Restrictions

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

63.3094(b) work practice requirements (plan)

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III. Monitoring and/or Record Keeping Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #08-2506 issued on 03/11/2003: A.III.2. through 7. The monitoring and record keeping

requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

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

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

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

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

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

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

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

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

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

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

63.3130(a) notification and reports verifying compliance
 63.3130(b) information provided by suppliers or manufacturers
 63.3130(c)(1) required information for each coating used

- 63.3130(c)(2) required information for each thinner used
 - 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
 - 63.3130(c)(6)(i) and (ii) average mass organic HAP content
 - 63.3130(d) through (h) required overall records that should be maintained
 - 63.3130(m) transfer efficiency records
 - 63.3130(n) record of the work practice plan

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IV. Reporting Requirements

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

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

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

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

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

- a. an identification of all 3-hour blocks of time during which the average combustion temperature was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent performance test that the emissions unit was in compliance;

- b. an identification of all exceedances of the rolling, 12-month gas usage restriction of 512 million cubic feet; and

- c. an identification of all exceedances of the rolling, 12-month VOC emission limitation of 28.34 tons.

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

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

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

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

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

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

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

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

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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:

- a. Emission Limitation-

The VOC content shall not exceed 0.74 lb VOC/gallon of coating, excluding water and exempt solvents, before the application of emission controls

Applicable Compliance Method-

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

- i. Sum the volumes, in gallons, of all the individual materials added to the dip tank, from Section A.III.2.c.

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

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

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

Applicable Compliance Method-

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

- i. Determine the total monthly solids volume, in gallons, for all the individual materials added to the dip tank by summing (c x d), from Section A.III.3, for the month for all materials added;
- ii. Determine the total monthly VOC emissions from all the materials added to the dip tank, in pounds, as follows:

- (a) Sum (b x c) for all the materials added to the dip tank, from Section A.III.3.

- iii. Divide V.1.b.ii by V.1.b.i to determine the monthly, volume-weighted average VOC emission rate, in pounds per gallon of applied solids of the combination of materials added to the dip tank.

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

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

Applicable Compliance Method-

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

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

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

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

Applicable Compliance Method-

Compliance shall be determined as follows:

- i. Determine the total monthly VOC emissions from all the materials added to the dip tank, in pounds, as follows:

- (a) Sum (b x c) for all the materials added to the dip tank, from Section A.III.3.

- (b) Determine the monthly VOC emissions, in tons, by dividing the VOC emission rate for the calendar month by 2000 lbs/ton.

- ii. Multiply the total monthly VOC emissions by (1 - the overall control efficiency for the control equipment as determined during the most recent emission testing that demonstrated the emissions unit was in compliance).

- iii. Determine the rolling, 12-month summation of the monthly VOC emission rates, in tons, by adding the monthly VOC emission rates for the previous 11 calendar months and the VOC emission rate for the current calendar month.

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

- e. Emission Limitations-
The NOx emissions from this emissions unit shall not exceed 25.6 tons/y; The CO emissions from this emissions unit shall not exceed 21.50 tons/yr, as rolling, 12-month summations

Applicable Compliance Method-

The annual emission limitations were determined by multiplying the maximum allowable natural gas consumption for each rolling, 12-month period of 512 million cu.ft. by the AP-42 emission factors of 100 lbs NOx/mm cu.ft. and 84 lbs CO/mm cu.ft. and dividing by 2000 lbs/ton. Therefore, provided compliance

is shown with the maximum allowable natural gas consumption restriction for each rolling, 12-month period, compliance shall also be shown with the rolling, 12-month emission limitations for NO_x and CO.

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

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

Applicable Compliance Method-

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

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

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

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

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

- a. The emission testing shall be conducted 12 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the thermal oxidizer destruction efficiency requirement, the overall control efficiency requirement, and the lbs/hr VOC emission rate.
- c. The test(s) shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

d. The capture efficiency shall be determined in accordance with the following:

i. Demonstrate that the system is under negative pressure at all natural draft openings (NDOs) identified as the entrance to the dip tank, the pendulum conveyor opening from the floor of the enclosure which permits conveyor return to the dip tank entrance, and the two oven exits. The demonstration shall be through the use of smoke tubes.

ii. Measure the VOC emissions from the oven exhausts (north and south inlets to thermal oxidizer), the outlet from the thermal oxidizer, and the uncontrolled stacks associated with this emissions unit (the rinse enclosure ambient exhausts). The VOC measurements shall be in accordance with the test methods and procedures specified in Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

iii. Calculate capture efficiency as follows: sum the total mass VOC emission rates measured from the north and south oven exhausts, divide by the sum of the total mass VOC emission rates measured from the dip tank ambient exhaust, the rinse enclosure ambient exhausts, and the north and south oven exhaust, and multiply by 100% as represented by the following equation:

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

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 Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K029 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

- 1. None.

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		
1. None		
	K029- electrocoating dip tank w/ natural gas- fired oven (ELPO) controlled with a thermal oxidizer	OAC rule 3745-17-11(A)(1)(h) This emissions unit employ surface coating processes that apply only dip coatings. It is therefore exempt from the requirements of OAC rule 3745-17-11(C).

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K031 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

1. None.

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

2. Additional Terms and Conditions

- a. The maximum VOC content of each coating material employed in this emissions unit shall not exceed the following:
 - (a)
 - i. 7.3 lbs VOC/gallon of coating, excluding water and exempt solvents, for the clear prime;
 - ii. 5.1 lbs VOC/gallon of coating, excluding water and exempt solvents, for the black prime; and
 - iii. 0.08 lb VOC/gallon of coating, excluding water and exempt solvents, for the urethane sealer.

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

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II. Operational Restrictions

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

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III. Monitoring and/or Record Keeping Requirements

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

of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

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

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

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

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

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IV. Reporting Requirements

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

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

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

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

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

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

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

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

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

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

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

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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:
 - a. **Emission Limitation-**
 The OC emissions from this emissions unit shall not exceed 117.8 lbs/day, excluding cleanup.

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

 [Authority for Term: OAC rule 3745-77-07(C)(1)]
 - b. **Emission Limitation-**
 The OC emissions from this emissions unit shall not exceed 16.53 tons/yr (excluding cleanup), as a rolling, 12-month summation

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

 [Authority for Term: OAC rule 3745-77-07(C)(1)]
 - c. **VOC content Limitations:**
 The VOC content shall not exceed 7.3 lbs VOC/gallon of coating (clear prime)
 The VOC content shall not exceed 5.1 lbs VOC/gallon of coating (black prime)
 The VOC content shall not exceed 0.08 lbs VOC/gallon of coating (urethane sealer)

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

 [Authority for Term: OAC rule 3745-77-07(C)(1)]
2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If the permittee determines that 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101349 Emissions Unit ID: K031 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

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

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

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

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K034 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K034- maintenance paint booth for metal and non-metal parts	OAC rule 3745-31-05(A)(3) PTI 08-3893	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 7 lbs/hr, 40 lbs/day, and 4.20 tons/yr (from all the coatings used for the metal and non-metal parts, combined) [See A.I.2.a and b.) [Emissions of VOC from cleanup materials from this emissions unit are accounted for in the permit for emissions unit K028.] The particulate emissions (PE) from this emissions unit shall not exceed 2.41 tons/yr.

OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(i), 3745-17-07(A), 3745-17-11(B) and 3745-21-07(G)(2). on the days when coating non-metal parts:
	The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	The daily limitation specified by this rule is as stringent as the daily limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)	The particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb/hr. See A.I.2.c.
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-21-09(U)(2)(e)(i)	On the days when coating metal parts the maximum daily coating usage for this emissions unit shall not exceed 8 gallons of coating.

2. Additional Terms and Conditions

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

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
- 2. The permittee shall document whether or not the paint overspray filter was in service when the paint spraying application associated with this emissions unit is in operation.

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

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IV. Reporting Requirements

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

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

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

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

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

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

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

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

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

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V. **Testing Requirements**

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

a. Emissions Limitation-

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

Applicable Compliance Method-

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

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

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

b. Emission Limitation-

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

Applicable Compliance Method-

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

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

c. Emission Limitation-

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

Applicable Compliance Method-

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

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

d. Emission Limitation-

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

Applicable compliance Method-

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

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

e. Emission Limitation -

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

Applicable Compliance Method -

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

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

- f. Emission Limitation -
The PE from this emissions unit shall not exceed 2.41 tons/yr.

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

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

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

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

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

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

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0857101349 Emissions Unit ID: K034 Issuance type: Title V Draft Permit

B. State Enforceable Section

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

1. None.

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.

Operations, Property, and/or Equipment Applicable Rules/Requirements

K034- maintenance paint booth for metal and OAC rule 3745-17-11(A)(1)(k)
non-metal parts

Applicable Emissions Limitations/Control Measures

This emissions unit employ surface coating processes that employ hand-held cup spray guns. It is therefore, exempt from the requirements of OAC rule 3745-17-11(C).

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0857101349 Emissions Unit ID: K035 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

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

- 1. None.

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

- 2. **Additional Terms and Conditions**

- (a) None

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II. Operational Restrictions

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

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III. Monitoring and/or Record Keeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The permittee shall comply with applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart IIII, including the following sections:
 - 63.3130(a) notification and reports verifying compliance
 - 63.3130(b) information provided by suppliers or manufacturers
 - 63.3130(c)(1) required information for each coating used
 - 63.3130(c)(2) required information for each thinner used
 - 63.3130(c)(4) and (5) record of the of the organic HAP emission rates
 - 63.3130(c)(6)(i) and (ii) average mass organic HAP content
 - 63.3130(d) through (h) required overall records that should be maintained
 - 63.3130(m) transfer efficiency records
 - 63.3130(n) record of the work practice plan

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IV. Reporting Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly deviation (excursion) reports that include the following:
 - a. All exceedances of the rolling, 12-month VOC emission limitation of 9.0 tons.
 - b. All exceedances of the daily VOC emission limitation of 64.0 pounds.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]
3. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted along with the "Fee Emissions Report" required pursuant to OAC rule 3745-78-02(A) by April 15th.

[Authority for Term: OAC rule 3745-77-07(C)(1)]
4. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate

Ohio EPA district Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart IIII, per the following sections:

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

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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:

a. Emission limitation-

The VOC emissions from this emissions unit shall not exceed 64.0 lbs/day

Applicable Compliance Method-

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

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

b. Emission limitation-

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

Applicable Compliance Method-

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

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

c. Emission limitation-

The VOC content shall not exceed 3.23 lbs VOC/gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method-

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

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

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VI. **Miscellaneous Requirements**

1. None

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B. State Enforceable Section

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

1. None.

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

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

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

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None