



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

**RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY
Application No: 08-04147**

CERTIFIED MAIL

DATE: 7/11/00

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DaimlerChrysler-Dayton Thermal Products
Joe Whitlock
1600 Webster St
Dayton, OH 45404-1144

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA
KY

RAPCA
IN

Miami Valley Reg Plan Com



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 08-04147

Application Number: 08-04147

APS Premise Number: 0857040734

Permit Fee: **To be entered upon final issuance**

Name of Facility: DaimlerChrysler-Dayton Thermal Products

Person to Contact: Joe Whitlock

Address: 1600 Webster St
Dayton, OH 45404-1144

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1600 Webster St
Dayton, Ohio**

Description of proposed emissions unit(s):

Paint booth and oven. This is a Chapter 31 PTI Modification replacing PTI #08-3568 issued 10/30/96.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	7.5
HAPs	4.5

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
K004 - 2 Cincinnati industrial machine paint booths with oven for radiator coating (Terms in this permit supersede those identified in PTI 08-3568 issued on 10/30/96)	OAC rule 3745-31-05(A)(3)	2.48 lbs VOC/gal coating minus water and exempt solvents
	OAC rule 3745-21-09(U)(1)(c)	15.1 lbs/hr, 7.5 TPY VOC
	OAC rule 3745-31-05(D) Synthetic Minor Restrictions	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)
		7.5 TPY VOC as a rolling, 12-month summation
		See A.2.a

2. **Additional Terms and Conditions**

- a. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this emissions unit shall be less than 4.5 TPY for any combination of HAPs as a rolling, 12-month summation.
- b. The 15.1 lbs/hr 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 reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 13,966 gallons, based upon a rolling, 12-month summation of the coating usage figures.

Given that the permittee has been required to maintain monthly records of coating usage by way of

DaimlerChrysler-Dayton Thermal Products
PTI Application: 08-04147
Issued: To be entered upon final issuance

Facility ID: 0857040734
Emissions Unit ID: K004

PTI 08-3568 issued on October 30, 1996, compliance with the annual coating usage limitation expressed in this permit through rolling, 12-month summations shall begin immediately upon issuance of this permit.

2. The emissions of combined HAPs from this emissions unit shall not exceed 4.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Given that the permittee has been required to maintain monthly records of coating usage by way of PTI 08-3568 issued on October 30, 1996, monthly combined HAP emissions can be determined, and compliance with the annual combined HAP emissions limitation expressed in this permit through rolling, 12-month summations shall begin immediately upon issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied, and the VOC content of each coating (including water and exempt solvents), as applied.
 - c. The number of gallons (including water and exempt solvents) of each coating employed.
 - d. The rolling, 12-month summation of the number of gallons (including water and exempt solvents) of the coating employed.
 - e. The total VOC emissions from the coating employed, i.e., (c) x VOC content (including water and exempt solvents) of the coating employed, in pounds or tons.
 - f. The rolling, 12-month summation of VOC emissions.
 - g. The total combined HAPs emissions from the coating employed, i.e., (c) x total combined HAP* content of the coating employed, in pounds or tons.
 - h. The rolling, 12-month summation of HAP emissions.

* A listing of Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. 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.

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation, the rolling, 12-month VOC emission limitation, and the rolling, 12-month combined HAP emission limitation. These quarterly reports shall be submitted in accordance with Part I - General Terms and Conditions No. 3.
1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the combined HAP emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. 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 method:

- a. Emission Limitation -
2.48 pounds of VOC per gallon of coating minus water and exempt solvents

Applicable Compliance Method -
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- b. Emission Limitation -
15.1 pounds of VOC per hour

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly coating usage rate, 14 gallons, by the coating's maximum VOC content, 1.074 lbs/gal (2.48 lbs/gal, minus water and exempt solvents).

- c. Emission Limitation -
7.5 tons of VOC per rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be determined by multiplying the actual rolling, 12-month coating usage by the coating VOC content, as required to be recorded in Section C.1., and then convert pounds to tons, 1 ton/2000 lbs.

DaimlerChrysler-Dayton Thermal Products
PTI Application: 08-04147
Issued: To be entered upon final issuance

Facility ID: 0857040734
Emissions Unit ID: K004

- d. Emission Limitation -
4.5 tons of combined hazardous air pollutants per rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be determined by multiplying the actual rolling, 12-month coating usage by the coating combined HAPs content, as required to be recorded in Section C.1., and then convert pounds to tons, 1 ton/2000 lbs.

F. Miscellaneous Requirements

1. In the event the coating employed in this emissions unit is reformulated resulting in a maximum VOC content of less than 2.48 pounds per gallon less water (1.074 pounds per gallon with water), the permittee shall be allowed to increase the maximum annual allowable coating usage to that amount which, when multiplied by the lower VOC content is equal to or less than the maximum annual allowable emission rate of 7.5 TPY VOC.
2. The permittee shall notify RAPCA of the revised maximum VOC content, less water, and the associated revised maximum annual allowable coating usage. The notification shall be in writing, shall include the manufacturer's coating formulation data, and shall be at least 30 days prior to implementation. Compliance with the revised maximum annual allowable coating usage rates shall continue to be based upon a rolling, 12-month summation.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04147

Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION paint booth and oven. This is a Chapter 31 PTI Modification replacing PTI 08-3568 issued 10/30/96. CITY/TWP Dayton

SIC CODE 3585 SCC CODE 4-02-025-0-036 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION 2 Cincinnati industrial machine paint booths with oven for radiator coating (Terms in this permit supersede those identified in PTI 08-3568 issued on 10/30/96)

DATE INSTALLED mod. upon issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment for ozone	15.1 lbs/hr	7.5	15.1	7.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT is compliance with applicable emissions limitations, VOC content requirement of 2.48 lbs/gal less water and exempt solvents, coating usage limitations, and monitoring and record keeping requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

PTI Number: 08-04147

Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION paint booth and oven. This is a Chapter 31 PTI Modification replacing PTI 08-3568 issued 10/30/96. CITY/TWP Dayton

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0000000c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

On 2/18/2000, DaimlerChrysler, Dayton Thermal Plant (DTP) requested a Chapter 31 Modification for emissions unit K004. The modification request included federally enforceable limitations of 7.5 TPY VOC and 4.5 TPY for any combination of HAPs. It is important to note that the combined HAPs limit of 4.5 TPY inherently limits any single HAP to 4.5 TPY.

This PTI modifies PTI 08-3658 issued 10/3/96. PTI 08-3568 contained federally enforceable limits of 39 TPY VOC and a coating usage limitation, both limits were based upon a rolling, 12-month summation. The new federally enforceable limitations of 7.5 TPY VOC and 4.5 TPY combined HAPs in conjunction with the Synthetic Minor PTI 08-4146 and the FESOP (containing facility-wide fuel usage limitations) will make DTP a Synthetic Minor Facility. The PTE analysis submitted on 3/31/00 and the 5/12/00 e-mail containing justification for calculating HAP emissions provide support documentation for DTP Synthetic Minor Status.

This permit requires the facility to maintain monthly records of coating formulation data, coating usage, VOC emissions and combined HAP emissions. The permit requires the facility to submit notification for the use of noncomplying coatings. The permit also requires the facility to submit quarterly deviation reports for violations of coating usage, VOC and combined HAP emissions. In addition, DTP is required to submit annual reports for VOC and combined HAP emissions.

The facility also requested flexibility to allow for coating formulation changes. Therefore, we inserted language allowing for formulation changes in the Miscellaneous Requirements, similar to language contained within PTI 08-3568. With formulation changes, the coating usage limitation may also change, and the compliance with any new usage limitation should begin immediately as a rolling, 12-month summation.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04147

Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION	paint booth and oven. This is a Chapter 31 PTI Modification replacing PTI 08-3568 issued 10/30/96.	CITY/TWP	Dayton
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DTP plans to slow production and eventually shut emissions unit K004 down permanently. According to 1999 data, the plant had VOC emissions equal to 10.0 TPY. The new limitation is 7.5 TPY and DTP has indicated that actual emissions will be much lower.

PTE Fees: PWR = 1 to 1,000, so fee is \$200.00 (with no necessary modifications)

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
 Permit To Install **ENTER PTI NUMBER HERE**

A. Source Description

DaimlerChrysler, Dayton Thermal Plant (DTP), SIC 3585, is a manufacturer of heating and cooling units for the automobile industry. DTP has requested a Chapter 31 PTI modification for the radiator coating booths with oven, emissions unit K004. The purpose of the PTI modification is to obtain federally enforceable limitations to restrict the potential to emit VOC and hazardous air pollutants for emissions unit K004. Emissions unit K004 consists of 2 Cincinnati industrial machine paint booths with oven.

B. Facility Emissions and Attainment Status

This air contaminant source will be located at 1600 Webster Street, Dayton, Ohio, Montgomery County. Montgomery County is currently designated as attainment for all pollutants. DTP is proposing 3 separate permit actions to limit potential emissions at the facility. The 3 separate permit actions are PTI 08-04146, PTI 08-04147, and a FESOP. DTP proposal will limit facility-wide emissions as follows: 67.31 TPY NO_x; 59.3 TPY SO₂; 6.44 TPY CO; 24.04 TPY PM, 90.33 TPY VOC; 0.45 TPY Lead; 8.05 TPY glycol ethers; and 24.03 TPY combined HAPs. DTP currently has a facility-wide PTE as follows: 458.96 TPY NO_x; 1,647.59 TPY SO₂; 101.57 TPY CO; 106.53 TPY PM; 202.98 TPY VOC; 0.46 TPY Lead; 14.16 TPY glycol ethers; and 38.40 TPY combined HAPs.

C. Source Emissions

PTI 08-3568 currently contains federally enforceable emissions limitations for emissions unit K004 which are 38.90 TPY VOC. The proposed limitations for this PTI are based upon a rolling, 12-month summation and include 7.5 TPY VOC and 4.5 TPY combined HAPs. The emission limitations will also be based upon a rolling, 12-month coating usage limitation of 13,966 gallons.

D. Conclusion

By effectively limiting the potential emissions for VOC and combined HAPs emissions from emissions unit K004, the total facility emissions for VOC, glycol ethers (inherently limited to 4.5 TPY by combined HAPs limit of 4.5 TPY) and combined HAPs are below major source threshold. Through federally enforceable coating usage limitations and record keeping requirements, the facilities potential emissions for VOC, glycol ethers and HAPs will be below Title V thresholds.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

NEW SOURCE REVIEW FORM B

PTI Number: 08-04147

Facility ID: 0857040734

FACILITY NAME DaimlerChrysler-Dayton Thermal Products

FACILITY DESCRIPTION	paint booth and oven. This is a Chapter 31 PTI Modification replacing PTI 08-3568 issued 10/30/96.	CITY/TWP	Dayton
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Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	7.5
HAPs	4.5