09/17/2026

Mr. Andrew Kroll
Ford Motor Company - Ohio Assembly Plant
650 Miller Rd
Avon Lake, OH 44012

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0247030471
Permit Number: P0134100
Permit Type: Administrative Modification
County: Lorain

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (Ohio EPA) ***Weekly Review and Public Notices*** website. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: ***eDocument Search***. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

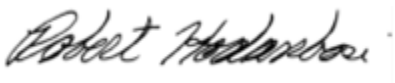
Andrea Moore
Permitting Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA ***Weekly Review and Public Notices*** website. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: ***Weekly Review and Public Notices | Ohio Environmental Protection Agency*** or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: ***HClerk@epa.ohio.gov***

Draft Air Pollution Permit-to-Install Administrative Modification

Ford Motor Company - Ohio Assembly Plant
650 Miller Road
Avon Lake, OH 44012-0000

ID#: P0134100
Date of Action: 09/17/2026
Permit Desc: Facility initiated administrative modification to incorporate RACT standards and a renewal of Plantwide Applicability Limits (PAL). Pursuant to Part D of Title I of the Clean Air Act (CAA), Ohio EPA is required to establish a State Implementation Plan (SIP) for the attainment and maintenance of the NAAQS. The above-mentioned permit is a part of Ohio's SIP for attainment and maintenance of the 2015 ozone NAAQS and will be submitted to United States Environmental Protection Agency (U.S. EPA) as a modification of the SIP.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit # P0134100 in the "Search Projects" search box.

The public comment period will run until 10/19/2026 at 11:59 PM.

Permit Strategy Write-Up

1. Check all that apply:

   ☐ Synthetic Minor Determination **N/A**

   ☐ Netting Determination **N/A**

2. Source Description:

   Enamel #1 ASH #1 burner for emissions units B011 –As required by the reclassification to serious nonattainment for ozone under the 2015 ozone National Ambient Air Quality Standards (NAAQS) promulgated by U.S. EPA, this facility has submitted a NOX Reasonably Available Control Technology (RACT) study on March 31, 2026 (subsequently revised on May 15, 2026, July 30, 2026 and July 31, 2026) to address the feasibility of controlling NOX emissions from Enamel #1 ASH #1 burner on emissions unit B011. This facility does not have any prior source-specific NOX RACT established under OAC rule 3745-110. This permit modification includes the implementation of the proposed RACT limits in the July 2026 revision of the RACT study. Section C of this permit cites the RACT limits under OAC rule 3745-110-03(J), and the applicable rules table implements this under an OAC rule 3745-31-05(D) synthetic minor restriction for the affected unit.

   Pursuant to Part D of Title I of the Clean Air Act (CAA), Ohio EPA is required to establish a State Implementation Plan (SIP) for the attainment and maintenance of the NAAQS. This permit is part of Ohio's SIP for attainment and maintenance of the 2015 ozone NAAQS and will be submitted to United States Environmental Protection Agency (U.S. EPA) as a modification of the SIP.

   This permitting action also includes a PAL renewal as required by OAC 3745-31-32 for operations of automotive assembly plant.

3. Facility Emissions and Attainment Status:

   This is a Title V facility. Lorain County was designated as "serious" nonattainment for the 2015 ozone NAAQS but is now a maintenance county. The county is currently designated attainment for all NAAQS (criteria) pollutants which include ozone, PM2.5, PM10, CO, NO2, lead and SO2.

4. Source Emissions:

   Emissions unit B011 has burner Enamel #1 ASH #1 with NOx emissions that are subject to the NOx RACT requirements. The NOx RACT determination for this emissions unit is to maintain and operate Enamel #1 ASH #1 burner on emissions unit B011, in accordance with the manufacturer's specifications, with any modifications deemed necessary by the permittee, and with good combustion practices, for the control of NOx emissions from this EU.

5. Conclusion:

   The permit modification establishes NOx RACT limits as proposed by Ford Motor Company - Ohio Assembly Plant in their NOx RACT study as part of the requirements for the 2015 ozone NAAQs nonattainment and maintenance areas under the reclassification to serious nonattainment for the Cleveland area. The NOx RACT limits established in this permit are to be implemented within the timeline specified by the permit terms.

6. Please provide additional notes or comments as necessary:

   This permitting action also includes a PAL renewal as required by OAC 3745-31-32 for operations of automotive assembly plant. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being requested to be renewed at the existing limits.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	1149.2
NOx	124.27
PM/PM10	31.32
PM2.5	26.32
CO	255.36
SO2	40.33
GHG	167,916

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install

for

Ford Motor Company - Ohio Assembly Plant

Facility ID:	0247030471
Permit Number:	P0134100
Permit Type:	Administrative Modification
Issued:	09/17/2026
Effective:	To be entered upon final issuance

Environmental Protection Agency

Division of Air Pollution Control

Permit-to-Install

for

Ford Motor Company - Ohio Assembly Plant

Table of Contents

Authorization

Facility ID:	0247030471
Facility Description:	Automobile and light truck assembly plant
Application Number(s):	M0007294, M0008214
Permit Number:	P0134100
Permit Type:	Permit-To-Install
Permit Fee:	$8,250.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	09/17/2026
Effective Date:	To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install for the emissions unit(s) identified on the following page to:

Ford Motor Company - Ohio Assembly Plant
650 Miller Road
Avon Lake, OH 44012-0000

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087
(330)963-1200

The above-named entity is hereby granted this Permit-to-Install for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) 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

John Logue
Director

Authorization (continued)

Permit Number: P0134100

Permit Description: Facility initiated administrative modification to incorporate RACT standards and a renewal of Plantwide Applicability Limits (PAL). Pursuant to Part D of Title I of the Clean Air Act (CAA), Ohio EPA is required to establish a State Implementation Plan (SIP) for the attainment and maintenance of the NAAQS. The above-mentioned permit is a part of Ohio's SIP for attainment and maintenance of the 2015 ozone NAAQS and will be submitted to United States Environmental Protection Agency (U.S. EPA) as a modification of the SIP.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**B004**
Company Equipment ID:	Phosphate Boilers #1 & #2
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	E-coat system
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K014**
Company Equipment ID:	Prime (Guidecoat) Booth System (CV)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K015**
Company Equipment ID:	Topcoat (Enamel) system #1
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K019**
Company Equipment ID:	Wax and touchup booth (CV)
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K025**
Company Equipment ID:	New Vehicle E-coat system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**K029**
Company Equipment ID:	New vehicle topcoat system.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K030**
Company Equipment ID:	Guidecoat system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K031**
Company Equipment ID:	Lower Bodyside Coating System
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Air Supply Sources

Emissions Unit ID:	**B010**
Company Equipment ID:	Tutone and repair scuff booth air supply
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**B011**
Company Equipment ID:	Enamel Booth #1 air supply
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**B019**
Company Equipment ID:	Wax and touch-up booth air supply
Superseded Permit Number:	02-4022
General Permit Category and Type:	Not Applicable 02-4022
Emissions Unit ID:	**B023**
Company Equipment ID:	Body shop air supply (Space/Dock Heaters - Comfort)
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**B024**
Company Equipment ID:	Trim shop air supply
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**B025**
Company Equipment ID:	Predelivery booth air supply
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281

Emissions Unit ID:	**B054**
Company Equipment ID:	New Vehicle Prime Booth Air Supply
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B056**
Company Equipment ID:	3-wet ASU 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B058**
Company Equipment ID:	3-wet ASU 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B059**
Company Equipment ID:	3-wet ASU 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Final Repair Operations

Emissions Unit ID:	**K021**
Company Equipment ID:	Final Repair Operations (Final Area)
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**K027**
Company Equipment ID:	New Vehicle Final repair system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Sealer Application Operation

Emissions Unit ID:	**K024**
Company Equipment ID:	Sealer Application Operation
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**K026**
Company Equipment ID:	New Vehicle Sealer Application Operation
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Windshield glass installation

Emissions Unit ID:	**K023**
Company Equipment ID:	Windshield glass installation
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**K028**
Company Equipment ID:	New Vehicle Windshield glass installation
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Wipe, Purge and Clean

Emissions Unit ID:	**P013**
Company Equipment ID:	Manual solvent wipe
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**P100**
Company Equipment ID:	Purge and clean
Superseded Permit Number:	P0128281
General Permit Category and Type:	Not Applicable P0128281
Emissions Unit ID:	**P102**
Company Equipment ID:	New Vehicle Purge and clean
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	$PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m3 = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH_4 = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO_2 = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m3 = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH_3 = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO_2 = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO_x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO_2 = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_4 = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m3 = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e), General Requirements

(3) Standard Term and Condition A.6.c), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B. and C. of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the state and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under state law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on

information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located, or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

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 state-only required 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 Ohio EPA DAPC, Northeast District Office. 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, 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.)

10. 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) not exempt from the requirement to obtain a permit-to-install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a

subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or any other reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

   a) None.

2. Establishment of Plantwide Applicability Limitations (PALs)

   a) The facility-wide VOC emission limitation of 1149.2 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in accordance with OAC rule 3745-31-32(E). The baseline actual emissions as calculated in accordance with OAC rule 3745-31-32(E) was 1,011 TPY and adding the significance level for VOC emissions of 40 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 1149.2 TPY on a rolling, 12-month basis.

   b) The facility-wide $PM_{2.5}$ emission limitation of 26.32 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in accordance with OAC rule 3745-31-32(E). The baseline actual emissions calculated in accordance with OAC rule 3745-31-32(E) was 14.91 TPY and adding the significance level for $PM_{2.5}$ emissions of 10 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 26.32 TPY on a rolling, 12-month basis.

   c) The facility-wide PM/PM_{10} emission limitation of 31.32 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in accordance with OAC rule 3745-31-32(E). The baseline actual emissions as calculated in accordance with OAC rule 3745-31-32(E) was 14.91 TPY and adding the significance level for PM/PM_{10} emissions of 15 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 31.32 TPY on a rolling, 12-month basis.

   d) The facility-wide NO_x emission limitation of 124.27 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in accordance with OAC rule 3745-31-32(E). The baseline actual emissions as calculated in accordance with OAC rule 3745-31-32(E) was 131.34 TPY and adding the significance level for NOx emissions of 40 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 124.27 TPY on a rolling, 12-month basis.

   e) The facility-wide CO emission limitation of 255.36 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in accordance with OAC rule 3745-31-32(E). The baseline actual emissions as calculated in accordance with OAC rule 3745-31-32(E) was 120.33 TPY and adding the significance level for CO emissions of 100 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 255.36 TPY on a rolling, 12-month basis.

   f) The facility-wide SO_2 emission limitation of 40.33 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in

accordance with OAC rule 3745-31-32(E). The baseline actual emissions as calculated in accordance with OAC rule 3745-31-32(E) was 0.88 TPY and adding the significance level for SO_2 emissions of 40 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 40.33 TPY on a rolling, 12-month basis.

g) The facility-wide greenhouse gas (GHG) emission limitation of 167,916 TPY on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon ten-year actuals PAL levels calculated in accordance with OAC rule 3745-31-32(E). The baseline actual emissions calculated in accordance with OAC rule 3745-31-32(E) was 176,550 TPY and adding the significance level for GHG emissions of 75,000 TPY to the baseline, the 10-year PAL level calculated is equal to or greater than 80 percent of the current PAL limit. As allowed by OAC 3745-31-32(I)(4)(a), the PAL limit is being renewed at the existing limit of 167,916 TPY on a rolling, 12-month basis.

3. Plantwide Applicability Limitations (PALs)

a) Emission Limitation:

Facility-wide VOC emissions shall not exceed 1149.2 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing VOC emissions on a rolling, 12-month basis from all EUs that emit VOCs at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total VOC emissions during each calendar month and consecutive 12-month period for each such source. VOC emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

b) Emission Limitation:

Facility-wide $PM_{2.5}$ emissions shall not exceed 26.32 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing $PM_{2.5}$ emissions on a rolling, 12-month basis from all EUs that emit $PM_{2.5}$ at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total $PM_{2.5}$ emissions during each calendar month and consecutive 12-month period for each such source. $PM_{2.5}$ emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

c) Emission Limitation:

Facility-wide PM/PM_{10} emissions shall not exceed 31.32 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM/PM_{10} emissions on a rolling, 12-month basis from all EUs that emit PM/PM_{10} at the facility, including but not limited to de minimis, exempt, and

combustion sources. For insignificant emissions sources, the permittee shall either maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total PM/PM_{10} emissions during each calendar month and consecutive 12-month period for each such source. PM/PM_{10} emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

d) Emission Limitation:

Facility-wide NO_x emissions shall not exceed 124.27 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing NO_x emissions on a rolling, 12-month basis from all EUs that emit NO_x at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total NO_x emissions during each calendar month and consecutive 12-month period for each such source. NO_x emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

e) Emission Limitation:

Facility-wide CO emissions shall not exceed 255.36 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all EUs that emit CO at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total CO emissions during each calendar month and consecutive 12-month period for each such source. CO emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

f) Emission Limitation:

Facility-wide SO_2 emissions shall not exceed 40.33 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SO_2 emissions on a rolling, 12-month basis from all EUs that emit SO_2 at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total SO_2 emissions during each calendar month and consecutive 12-month period for each such source. SO_2 emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

g) Emission Limitation:

Facility-wide GHG emissions shall not exceed 167,916 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all EUs that emit GHG at the facility, including but not limited to de minimis, exempt, and combustion sources. For insignificant emissions sources, the permittee shall maintain monthly records, including calculations, from either monthly usage records or ratioed annual emissions from the previous year that show the total GHG emissions during each calendar month and consecutive 12-month period for each such source. GHG emissions from non-insignificant EUs shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each EU.

4. PAL Monitoring and Record Keeping Requirements

a) The permittee shall maintain a copy of all records necessary to determine compliance with any requirement of OAC rule 3745-31-32(A) and of the PAL, including a determination of each emission unit's rolling, 12-month total emissions, for 5 years from the date of such record.

b) The permittee shall retain a copy of the following records for the duration of the PAL effective period plus five years:

(1) a copy of the PAL permit application and any applications for revisions to the PAL; and

(2) each annual certification of compliance pursuant to Title V and the data relied on in certifying compliance.

c) The permittee shall monitor all EUs at the facility for VOC, $PM_{2.5}$, $PM/PM_{10,}$ NO_x, CO, SO_2 and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS and/or emission factors).

5. PAL Reporting Requirements

a) The permittee shall submit semiannual monitoring reports and prompt deviation reports to the Ohio EPA Northeast District Office in accordance with the applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:

(1) Semiannual report:

The semi-annual report shall be submitted to the Ohio EPA Northeast District Office within thirty days of the end of each reporting period. This report shall contain the following information:

a. The identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install.

b. Total annual emissions (TPY) based on a rolling, 12-month total for each month in the reporting period recorded pursuant to B.2 of these terms and conditions.

c. All data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual PAL pollutant emissions. It is acceptable for this data to be maintained at the facility and made available to the Ohio EPA upon request.

d. A list of any EUs modified or added to the major stationary source during the preceding 6-month period.

e. The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.

f. A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the EU monitored by the monitoring system continued to operate, and the calculation of the emissions of any pollutant or the number determined by method included in the PAL permit (OAC rule 3745-31-32(A)(11)(g)).

g. A signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(2) Deviation report:

The major stationary source owner or operator shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to paragraph (A)(3)(c)(iii) of OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by OAC rule 3745-77-07 and/or Standard Terms and Conditions items A.4.c)(1) through A.4.c)(4) of this permit. The reports shall contain the following information:

a. the identification of owner and operator, the facility ID, and the permit-to-install numbers for any applicable permit-to-install;

b. the PAL requirement that experienced the deviation or that was exceeded;

c. emissions resulting from the deviation or the exceedance; and

d. a signed statement by the responsible official (as defined by the Title V operating permit program contained in Chapter 3745-77 of the Ohio Administrative Code) certifying the truth, accuracy, and completeness of the information provided in the report.

(3) Re-validation results:

The owner or operator shall submit to the Ohio EPA Northeast District Office the results of any re-validation test or method within three months after completion of such test or method.

6. PAL Compliance Demonstration

a) Emission calculations to demonstrate compliance with the PAL include VOC emissions from startups, shutdowns, and malfunctions.

b) The permittee shall determine monthly VOC, NO_x, CO, SO_2, GHG, PM/PM_{10} and $PM_{2.5}$ emissions in accordance with the Monitoring and Record Keeping Requirements for each EU for the purpose of summing plantwide VOC, NO_x, CO, SO_2, PM/PM_{10} and $PM_{2.5}$ emissions and determining the rolling, 12-month VOC, NO_x, CO, SO_2, GHG, PM/PM_{10} and $PM_{2.5}$ emissions.

7. PAL Permit Requirements

   a) The PALs in section B.1 shall be effective for ten years. The PAL term commences on the date of issuance of this permit.

   b) If the permittee chooses to renew this PAL, the permittee shall submit a complete application between six and eighteen months prior to the expiration of the PAL. This PAL shall not expire until a revised PAL permit is issued if a complete application is received by Ohio EPA Northeast District Office within the time frame specified. (OAC rule 3745-31-32(A)(9)(b))

      (1) If the permittee fails to meet the application requirements in section B.6.b) or the PAL expires, the facility is subject to the requirements of OAC rule 3745-31-32(A)(8).

      (2) This permit authorizes projects involving the installation of new EUs and modification of existing EUs that do not require an increase in emissions limitations provided that the new EU or modification of any existing EU(s) will not cause the violation of any applicable air requirement.

      (3) A demonstration that the new or modified EU meets these criteria shall be kept on site for the life of the new or modified EU and made available to the Ohio EPA upon request. The permittee must notify the Ohio EPA Northeast District Office of the installation of the new EU or modification of an existing EU 30 days before the installation or modification of the EU.

8. The provisions of OAC rule 3745-114 address Ohio's "Air Toxic Policy" and the mechanism for evaluating certain air toxic contaminants from air emissions sources. The provisions of the regulation do not apply to a pollutant that is subject to a MACT standard or residual risk standard under section 112 of the Federal Clean Air Act pursuant to ORC 3704.03(F)(4)(e).

   a) The following EUs at this facility are subject to 40 CFR Part 63, Subpart IIII, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

      B005 (Air supply for E-Coat scuff booth 9.6 MMBtu/hr);

      B010 (Air supply to tutone and repair scuff booth 13.6 MMBtu/hr);

      B011 (Air supply for enamel spray booth no. 1 - 88.0 MMBtu/hr);

      B019 (Air supply for wax and touchup spray booth 10.585 MMBtu/hr);

      B025 (Air supply for predelivery spray booth 72.72 MMBtu/hr);

      B026 (Carbon wheel desorption preheat burners 5.0 MMBtu/hr);

      B054 (Direct-Fired Natural Gas New Vehicle Prime Booth air supply – 20.83 MMBtu/hr);

      B055 (Two Direct-Fired Natural Gas New Vehicle Sealer Work decks air supply - 3.0 MMBtu/hr each);

      B056 (Direct, Natural gas fired Air Supply Unit 3-wet 1 - 19.6 MMBtu/hr);

      B057 (Direct, Natural gas fired Air Supply Unit 3-wet 2 - 7.4 MMBtu/hr);

      B058 (Direct, Natural gas fired Air Supply Unit 3-wet 3 - 17.6 MMBtu/hr);

      B059 (Direct, Natural gas fired Air Supply Unit 3-wet 4 - 17.9 MMBtu/hr);

K007 (E-Coat system) including dip tank, oven, and RTO;

K014 (Prime Guidecoat System) including prime booth, oven, and RTO;

K015 (Topcoat/Enamel System #1) including enamel booth, oven, and RTO;

K019 (Wax and touchup booth);

K021 (Final repair system) including final repair booth, oven, and spot repair;

K023 (Windshield glass installation process);

K024 (Sealer operations) including sealer deck, sealer application booth, and ovens;

K025 New vehicle E-coat system

K026 New vehicle Sealer Application Operation (sealer deck, 2 application booths and sealer oven)

K027 New vehicle final repair system

K028 New vehicle Windshield glass installation

K029 New vehicle topcoat system

K030 New vehicle guidecoat system

K031 Lower Bodyside coating system

P013 (Manual solvent wipe);

P020 (E-Coat scuff booth);

P021 (Prime and tutone scuff booth);

P100 (Purge and clean); and

P102 (New Vehicle Purge and clean)

b) The following EUs at the facility are subject to 40 CFR Part 63, Subpart EEEE, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

P026 (New vehicle windshield washer fluid fill)

T041 (9,988 gallon Methanol Tank)

T047 (6,736 gallon windshield washer fluid/ water mix storage tank 1)

T048 (6,736 gallon windshield washer fluid/ water mix storage tank 2)

c) The following EUs at the facility are subject to 40 CFR Part 63, Subpart ZZZZ, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs:

B028 (204 HP electrical emergency generator);

B030 (204 HP electrical emergency generator);

B031 (204 HP electrical emergency generator);

B032 (204 HP electrical emergency generator);

B033 (204 HP electrical emergency generator);

B034 (204 HP electrical emergency generator);

B035 (260 HP firefighting water pump);

B038 (204 HP electrical emergency generator);

B039 (204 HP electrical emergency generator);

B040 (183 HP Clarke firefighting pump);

P025 (75 HP electrical emergency generator); and

P101 (89 HP electrical emergency generator).

d) In addition, if the toxic air contaminant is an organic HAP subject to the MACT standard identified above (40 CFR Part 63, Subpart IIII, Subpart EEEE, and Subpart ZZZZ) and emitted by any air contaminant source not identified above, modeling in accordance with Ohio's "Air Toxic Policy" is not required.

In the event any future MACT standards are deemed applicable to the facility and/or any air contaminant source(s) at the facility, those source(s) will not be subject to the requirements of Ohio's "Air Toxic Policy" or the conditions that follow for organic HAPs.

For air contaminant sources not subject to a MACT standard, physical changes to or changes in the method of operation of any of the EUs at the facility could affect the parameters used to determine whether the "Air Toxic Policy" is satisfied. Consequently, prior to making a change to such air contaminant sources that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change without first obtaining Ohio EPA approval. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

e) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a compound with a lower TLV, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously evaluated;

f) Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

g) Physical changes to the EU or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit-to-install would not be required.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed EU will still satisfy the "Air Toxic Policy":

h) A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

i) Documentation of its evaluation and determination that the changed EU still satisfies the "Air Toxic Policy"; and

j) Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

The results of any modeling shall be submitted with the semi-annual report.

Physical changes to or changes in the method of operation of any EUs at the facility that satisfy the "Air Toxic Policy" do not require a new permit and/or permit modification.

In lieu of the above requirements, the permittee may devise its own method to demonstrate that the change(s) will satisfy the "Air Toxic Policy" subject to approval by the Ohio EPA. This could include initial modeling under "worst case scenario" and evaluating whether each change would fall within that scenario and satisfy the "Air Toxic Policy".

9. The permittee shall comply with all applicable sections of 40 CFR Part 63, Subpart IIII, for the following EUs and their associated combustion sources, respectively: K007; K014 (B008); K015 (B011 and B026); K019 (B019); K021 (B025); K023; K024; K025; K026; K027; K028; K029; K030 (B054); K031 (B056, B057, B058 and B059); P013; P020; and P021 (B010).

10. The permittee shall comply with any applicable sections of 40 CFR Part 63, Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, no later than the compliance date specified upon issuance of the final rule. Any applicable permit terms and conditions associated with 40 CFR Part 63, Subpart DDDDD, shall be incorporated in accordance with OAC rule 3745-31-32(A)(9)(e) either at the time of PAL permit renewal or Title V permit renewal, whichever occurs first.

    The following sources will be subject to 40 CFR Part 63, Subpart DDDDD: Phosphate boiler #1/Cleaver Brooks rated at 20.992 MMBtu/hr heat input capacity (EU B004), Phosphate boiler #2/Cleaver Brooks rated at 20.992 MMBtu/hr heat input capacity (EU B004), West admin. boiler #1/Fitness Center rated at 4.064 MMBtu/hr heat input capacity (EU B048), West admin. boiler #2/Fitness Center rated at 4.064 MMBtu/hr heat input capacity (EU B049), and VOC boiler rated at 8.06 MMBtu/hr heat input capacity (B050). Combustion sources associated with coating lines and ovens are subject to 40 CFR Part 63, Subpart IIII, and, therefore, are not subject to 40 CFR Part 63, Subpart DDDDD.

11. The following insignificant EUs 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:

    B005: Air supply for E-coat scuff booth (9.6 MMBtu/hr);

    B026: Carbon wheel desorption preheat burners (5.0 MMBtu/hr);

    B028: Emergency generator (204 hp);

    B030: Emergency generator (204 hp);

    B031: Emergency generator (204 hp);

    B032: Emergency generator (204 hp);

    B033: Emergency generator (204 hp);

B034: Emergency generator (204 hp);

B035: Firefighting water pump (260 hp);

B038: Emergency generator (204 hp);

B039: Emergency generator (204 hp);

B040: Clarke firefighting water pump (183 hp);

B041: 179 Natural Gas Fired Space Heaters - 4 to < 10 MMBtu/hr

B053: 7.5 MMBtu/hr Natural Gas-Fired BEV-C Phosphate Boilers #1, #2, and #3

B055: Two Direct-Fired Natural Gas BEV-C Sealer Decks Air Supply (3.0 MMBtu/hr each)

B060: 6.0 MMBtu/hr Direct, Natural gas fired tackoff CAU

B061: 5.0 MMBtu/hr Direct, natural-gas fired clean room RAU

B062: Seven Direct, natural-gas fired building space heaters - 3 heaters (10 MMBtu/hr each), 7 heaters (6 MMBtu/hr each)

P026: New vehicle windshield washer fluid fill

P027: New vehicle cooling towers

T045: 12,044 gal antifreeze /water mix storage tank 1

T046: 12,044 gal antifreeze /water mix storage tank 2

T047: 6,736 gallon windshield washer fluid/ water mix storage tank 1

T048: 6,736 gallon windshield washer fluid/ water mix storage tank 2

T049: 6,605 gallon pretreatment dump tank 1

T050: 6,605 gallon pretreatment dump tank 2

T051: 6,605 gallon pretreatment dump tank 3

T052: 6,605 gallon e-coat dump tank 1

T053: 6,605 gallon e-coat dump tank 2

T054: 6,605 gallon bulk e-coat resin tank

T055: 6,605 gallon bulk pretreatment tank

T056: 6,605 gallon bulk pretreatment degrease tank

L001: Solvent cold cleaners

P012: Paint mix room;

P015: Body welding;

P018: Phosphate coating line;

P020: E-coat scuff booth;

P021: Prime and tutone scuff booth;

P025: Emergency generator (75 hp)

P101: Emergency generator (89 hp)

T004: 10,000 gallon oil separator storage tank;

T006: 10,000 gallon brake fluid storage tank;

T007: 10,000 gallon automatic transmission fluid storage tank;

T008: 10,000 gallon power steering fluid storage tank;

T009: 10,000 gallon manual transmission fluid storage tank;

T010: 10,000 gallon anti-freeze storage tank;

T011: 6,000 gallon refrigerant storage tank;

T012: 90,000 gallon No.1 E-coat dump tank;

T013: 90,000 gallon No. 2 E-coat dump tank;

T014: two 6,000 gallon E-coat resin storage tanks;

T016: 6,000 gallon sulfuric acid storage tank;

T017: 6,000 gallon sodium hydroxide storage tank;

T019: 6,000 gallon E-coat pigment storage tank;

T041: 9,988 gallon methanol tank;

T042: 12,000 gallon Gasoline Tank #1;

T043: 12,000 gallon Gasoline Tank #2;

T044: 12,000 gallon Gasoline Tank #3;

T057: Storage - 10,000 gal Waste Purge Solvent/Paint Tank; and

T058: Storage - 10,000 gal Waste Paint/Purge Solvent.

12. EUs K007, K014, K015, K019, K021, K023, K024, K025, K026, K027, K028, K029, K030, K031 P013, P100 and P102 are subject to the following work practices specified in OAC rule 3745-21-29(E) for coating-related activities and cleaning materials for coating operations for which emission limitations are specified under OAC rule 3745-21-29(C):

a) Store all VOC-containing coatings, thinners, and coating-related waste materials in closed containers;

b) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, and coating-related waste materials are kept closed at all times except when depositing or removing these materials;

c) Minimize spills of VOC-containing coatings, thinners, and coating-related waste materials;

d) Convey VOC-containing coatings, thinners, and coating-related waste materials from one location to another in closed containers or pipes;

e) Minimize VOC emission from cleaning of storage, mixing and conveying equipment; and

f) Develop and implement a work practice plan to minimize VOC emissions from cleaning and from purging of equipment associated with all coating operations for which requirements are specified in OAC rule 3745-21-29 paragraphs (C) and (D). The work practice plan shall specify practices and procedures to ensure that VOC emissions from the following operations are minimized:

(1) Vehicle body wiping;

(2) Coating line purging;

(3) Flushing of coating systems;

(4) Cleaning of spray booth grates;

(5) Cleaning of spray booth walls;

(6) Cleaning of spray booth equipment;

(7) Cleaning external spray booth areas; and

(8) Other housekeeping measures (e.g., keeping solvent-laden rags in closed containers).

Comment: If a facility subject to this rule already has a work practice plan in place under the NESHAP, the facility can add to its NESHAP work practice plan the practices and procedures for minimizing non-HAP VOC emissions.

13. EUs K007, K014, K015, K019, K021, K023, K024, K025, K026, K027, K028, K029, K030, K031 P013, P100 and P102 are subject to the following work practice recordkeeping requirements specified in OAC rule 3745-21-29(G)(3) for compliance demonstration for coating-related activities and cleaning materials work practice requirements of OAC rule 3745-21-29(E):

a) For the coating-related activities and cleaning materials, the owner or operator shall maintain the following records on a monthly basis:

(1) A copy of any documents and the work implementation plan that address the procedures for ensuring compliance with the work practices identified in B.12; and

(2) A determination on whether the work practices are being met.

14. The existing emergency or limited use compression ignition (CI) reciprocating internal combustion engines (RICE), less than or equal to 500 brake hp and located at a major source for HAPs, are subject to the requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The existing stationary CI RICE, EUs B028, B030, B031, B032, B033, B034, B035, B038, and B039, installed before 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than 5/3/13.

15. The new emergency or limited use compression ignition (CI) reciprocating internal combustion engine(s) (RICE), less than or equal to 500 brake hp, and located at a major source for HAPs, is/are subject to the requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ. The new stationary CI RICE, EU B040, P025, and P101, installed on or after 6/12/06, shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ upon startup, through demonstration of compliance with the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII.

B. Emissions Unit Terms and Conditions

1. B004, Phosphate Boilers #1 & #2

Operations, Property and/or Equipment Description:

Phosphate heater (20.9 MMBtu/hr)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-17-07(A)	VE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu actual heat input.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO_2 in this rule for this EU.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility–wide VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions apply to this EU. The PALs for VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(4), and d)(5) contribute to the calculation of the total VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions from this facility as specified in B.2.
f.	OAC rule 3745-110-03(K)(1)	See b)(2)b. and d)(6).
g.	40 CFR Part 63, Subpart DDDDD	See B.10, b)(2)a., c)(1), d)(1,) e)(1), and f)(2).

h.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. See 40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480- 7575).

b. The permittee shall perform or have performed a tune-up on each boiler annually.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Table 3 to Subpart DDDDD	Work practices
63.7540(a)(10)	Annual tune-up requirement

(2) The permittee shall only employ NG and LPG as fuel in this EU.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7515(d)	Conduct an annual, biennial, or 5-year performance tune-up according to 63.7540(a)(10), (11), or (12), respectively, no later than 13 months, 25 months, or 61 months, respectively, after the initial startup of the new or reconstructed affected source
63.7540(a)(10)	Annual tune-up requirements specified in paragraphs 63.7540(a)(10)(i) through (a)(10)(vi)
63.7560(a)-(c)	Recordkeeping retention and format

(2) For each day during which the permittee burns a fuel other than NG or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this EU.

(3) The permittee shall maintain monthly records of the volumes of NG and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of NG and LPG burned in this EU for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this EU:

MPV = (Xi/Sum of Xi) multiplied by TPV

where:

MPV = the monthly prorated volume of the fuel used, either NG or LPG;

Xi = the heat input capacity of this EU, in MMBtu/hr;

Sum of Xi = the summed total heat input, in MMBtu/hr of all operational combustion EUs located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either NG or LPG.

(4) The permittee shall use emission factors from AP-42 to calculate monthly VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

(5) The permittee shall maintain monthly records of the calculated, monthly VOC, $PM2_{.5}$, PM/PM_{10}, NOx, CO, SO_2 and GHG emission rates for this EU in lbs per month, and the rolling, 12-month VOC, $PM_{2.5}$, PM/PM_{10}, NOx, CO, SO2 and GHG emission rates for this EU, in TPY.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of NG burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

(6) The permittee shall maintain, in a permanently bound logbook, or other equivalent electronic method that ensures data integrity, the following information:

a. The date of the last tune-up;

b. The name, title and affiliation of the person who performed the tune-up and made any adjustments; and

c. Any other information which the Ohio EPA may require as a condition of approval of any permit for the boiler.

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)	Notice of Compliance Status requirements for tune-up
63.7530(e)	Notification of Compliance Status requirements for the energy assessment
63.7540(a)(10)(vi)	Submit if requested, an annual report containing the information in 63.7540(a)(10)(vi)(A) through (C)
63.7540(b)	Requirement to report deviations in accordance with 63.7550
63.7550 and Table 9 to Subpart DDDDD	Content and submission of compliance reports

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than NG or LPG was burned in this EU. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

PE shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

(2) Each tune-up conducted to demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD, shall include the following elements:

a. inspection of the burner(s) (and requirement to clean or replace any necessary components);

b. inspection of the flame pattern and requirement to adjust the burner as necessary to optimize the flame pattern, consistent with the manufacturer's specifications if applicable;

c. inspect the air-to-fuel ratio control system to ensure it is correctly calibrated and functioning properly;

d. optimize total emissions of CO, in correlation with any applicable NOx standards, consistent with the manufacturer's specification if applicable;

e. measure the concentration of CO (in ppm, by volume) and oxygen (in volume percent) in the effluent gas stream, at the high-fire or typical operating load, and both before and after any adjustments (measurements can be made using a portable CO analyzer);

f. maintain records of the tune-up, inspection, and any corrective actions taken; and

g. where more than one type of fuel is used, records of the type and amount of each fuel type burned over the 12 months prior to the tune-up.

Inspections may be delayed until the next scheduled shutdown; and units that produce electricity for sale may delay the inspection until the first outage, but may not exceed 36 months from the previous inspection. The frequency of tune-ups shall be based on the frequency identified in Table 3 to the subpart. For a new unit, an initial tune-up must be completed within the annual schedule, as specified in Table 3 to the subpart, following initial startup of the unit.

g) Miscellaneous Requirements

(1) None.

2. K007, E-coat system

Operations, Property and/or Equipment Description:

E-coat tank and oven

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM (60.390 through 60.398) In accordance with 40 CFR 63.390(a), this EU is an automobile or light-duty truck assembly plant EDP prime coat operation subject to the emission limitations/control measures specified in this section.	See b)(2)b., d)(6), e)(5), and f)(3).
b.	OAC rule 3745-21-29(C)(1)(a)	See b)(2)c.
c.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
d.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.

e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) and d)(3) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	See b)(2)d., c)(1, d)(7) , (e)(6), and f)(1)c.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	OAC rule 3745-31-05(F)	See b)(2)a.

(2) Additional Terms and Conditions

a. The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions. When a control efficiency is claimed, the control device shall be operated in accordance with applicable operating parameters identified in this permit. The RTO temperature requirements and destruction efficiency claimed are determined by the testing requirements in section f)(2).

i. The E-Coat system by design and operation provides a permanent total enclosure. This EU's VOC capture efficiency shall, therefore, be presumed to be 100 percent by weight. This determination was made by Ohio EPA at the permittee's request, based on the submission of data which verify that the entrance and exit of the E-Coat system are not natural draft openings as defined in U.S. EPA Methods 204 through 204F, 40 CFR Part 51, Appendix M.

b. In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.17 kilogram of VOC per liter of applied coating solids when solids turnover ratio (R_T) is 0.16 or greater.

ii. $0.17 \times 350^{(0.160 - RT)}$ kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in 40 CFR 60.393(c)(1)(i)(E).

c. The permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio (R_T) is 0.16 or greater.

ii. $0.70 \times 350^{(0.160 - RT)}$ pounds of VOC per gallon of solids when R_T is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

d. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) In order to claim a control efficiency for this EU when calculating VOC emissions during a period of operation, the average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the EU was in compliance.

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the EU is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the EU was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) The permittee shall collect and record the following information for each day for this EU:

a. The name and identification number of each material (coating, solvent, etc.) added to the E-Coat tank;

b. The VOC content, in pounds VOC per gallon and in pounds VOC per gallon of solids, of each material added to the E-Coat tank;

c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material added to the E-Coat tank;

d. The monthly, uncontrolled, volume-weighted average VOC content of all the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-09;

e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds VOC per gallon of solids. The daily, controlled VOC emission rate shall be calculated using (i) the daily, uncontrolled, volume-weighted average VOC

content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the EU was in compliance;

f. The total uncontrolled VOC emissions from all the materials added to the E-Coat tank, in pounds; and

g. The total, controlled VOC emissions from all the materials added to the E-Coat tank, in pounds. The controlled VOC emission rate shall be calculated using (i) the total VOC emissions from d)(3)f above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the EU was in compliance.

(4) The permittee shall collect and record the following information for each month for this EU:

The name and identification number of each coating material added to the E-Coat tank;

a. The name and identification number of each coating material added to the E-Coat tank

b. The VOC content, in pound of VOC per gallon of solids, of each material added to the E-Coat tank;

c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material employed;

d. The monthly, uncontrolled, volume-weighted average VOC content of the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-10; and

e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds of VOC per gallon of solids. The monthly, controlled VOC emission rate shall be calculated using (i) the monthly volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the EU was in compliance.

(5) For each EDP primer coating operation, calculate the turnover ratio (RT) when used to adjust the VOC emission limit as described in OAC rule 3745-21-29(C)(1)(a)(ii) and (C)(1)(a)(iii), by the following equation:

RT = VS / VE , truncated after three decimal places

Where:

VE = volume of EDP primer coating tank, in gallons.

Vs = volume of solids added to the EDP primer coating tank during the month, in gallons.

Vs = summation of (Ai,month)(Vi,solids) for i=1 to i=n

Ai,month= amount of material i added to the reservoir of the dip coater during a calendar month, expressed in gallons.

Vi,solids= volume fraction of solids (nonvolatile matter) in material i.

i = subscript denoting a specific material (coating or thinner) added to the reservoir of the dip coater during the calendar month.

n = total number of materials (coatings and thinners) added to the reservoir of the dip coater during the calendar month.

Then calculate or select the appropriate limit according to OAC Rule 3745-21-29 (C)(1)(a).

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart MM, including the applicable parts for the following sections:

60.393	Performance test and compliance provisions.
60.394	Monitoring of emissions and operations.

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above.

(2) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any daily record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)c of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(3) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any monthly record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC

emission limitation specified in section b)(2)b of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(4) The permittee shall also submit annual reports that specify the total VOC emissions from this EU during the previous calendar year. These reports shall be submitted by January 31 of each year.

(5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart MM, including the applicable parts for the following sections:

60.395	Reporting and recordkeeping requirements.

(6) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

In accordance with 40 CFR 60.392(a), the permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.17 kilogram of VOC per liter of applied coating solids when solids turnover ratio (R_T) is 0.16 or greater.

ii. $0.17 \times 350^{(0.160 - RT)}$ kg of VOC per liter of applied coating solids when R_T is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in 40 CFR 60.393(c)(1)(i)(E).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in 40 CFR 60.393.

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

b. Emission Limitation:

The permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio (R_T) is 0.16 or greater.

ii. $0.70 \times 350^{(0.160 - RT)}$ pounds of VOC per gallon of solids when R_T is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in OAC rule 3745-21-29(F).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

d. Emission Limitation:

The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions.

Applicable Compliance Method:

The permittee shall determine the RTO temperature requirements and destruction efficiency claimed through the testing requirements in section f)(2).

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational

conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

(3) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).

g) Miscellaneous Requirements

(1) None.

3. K014, Prime (Guidecoat) Booth System (CV)

Operations, Property and/or Equipment Description:

Prime booth and oven (CV) includes spray prime and hood anti-chip.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	VOC emissions from each guide coat operation shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average. See d)(4), e)(4) and f)(3).
b.	OAC rule 3745-21-29(C)(1)(c)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations as a daily volume-weighted average.
c.	OAC rule 3745-21-29(C)(1)(e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average. See b)(2)c.
d.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
e.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is

		subject to a plant-wide applicability limit that has been approved by the director.
f.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(2), c)(3), d)(8) through d)(12) and e)(7).
g.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility–wide VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions apply to this EU. The PALs for VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions from this facility as specified in B.2.
h.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d., c)(4), d)(5), e)(5), and f)(1)d.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
j.	OAC Rule 3745-31-05(F)	See b)(2)a.

(2) Additional Terms and Conditions

a. The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions. When a control efficiency is claimed, the control device shall be operated in accordance with applicable operating parameters identified in this permit. The RTO

temperature requirements and destruction efficiency claimed are determined by the testing requirements in section f)(2).

b. The permittee shall operate the waterwash control system whenever this EU is in operation.

c. This emissions limitation is a daily volume-weighted average of the entire combined primer-surfacer and topcoat coating operations (i.e., all spray booths, flash-off areas and bake ovens where primer-surface coatings and topcoat coatings are applied, dried, and cured, except those spray booths, flash-off areas and bake ovens in the final repair coating operations). This is an alternative emission limitation in place of the emission limitations separately applicable to primer-surfacer coating operations and topcoat coating operations at the facility.

d. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) These emissions units can apply in a wet sequence which is identified as the following: A 3-Wet booth is where Guidecoat primer, Basecoats and Clearcoats are applied to each vehicle body without heated flash-off zones or oven curing between application steps. The vehicle bodies will then be directed to the 3-Wet Oven (formerly Enamel Oven) where the applied coatings will be cured. The 3- wet sequence can be operated in the following manner:

a. EU K014 is adjoined to the front of the Topcoat booth (EU K015) to apply Guidecoat coatings in a “3-Wet” sequence.

(2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control PE.

(3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(4) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) In order to claim a control efficiency for this EU when calculating VOC emissions during a period of operation, the average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the EU was in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizer when the EU is in operation. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the EU was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) The permittee shall maintain records for EUK014 that will enable, for each calendar day, the calculation of the daily VOC emission rate for each EU in both lbs VOC per day and lbs VOC per gallon of deposited solids, 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-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculations on a daily basis and shall maintain records of the results of the calculations.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart MM, including the applicable parts for the following sections:

60.393	Performance test and compliance provisions.
60.394	Monitoring of emissions and operations.

(5) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

(6) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for EUK014 in lbs per month, and the rolling, 12-month VOC emission rate in TPY.

(7) The permittee shall maintain daily records of the number of hours of operation for this EU.

(8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request. The permittee maintains documentation of manufacturer's recommendations, instructions, and/or operating manual(s) through incorporation into the facility's maintenance management system.

(9) The permittee shall conduct periodic inspections of the waterwash control 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(10) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(11) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. 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 DO/LAA upon request.

(12) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the EU was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

(2) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(3) The permittee shall also submit annual reports that specify the total VOC emissions from EUK014 for the previous calendar year. These reports shall be submitted by January 31 of each year.

(4) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart MM, including the applicable parts for the following sections:

60.395	Reporting and recordkeeping requirements.

(5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

(6) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EU was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide $PM_{2.5}$ emissions shall not exceed 26.32 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine $PM_{2.5}$ emissions from this EU to establish a facility-wide $PM_{2.5}$ emission rate, the permittee shall conduct, or have conducted, representative $PM_{2.5}$ emission testing for this EU to establish the $PM_{2.5}$ emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201A and 202.

The $PM_{2.5}$ emission rate testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA DO/LAA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU

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 appropriate Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within three months 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 DO/LAA.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

VOC emissions shall not exceed 1.40 Kg per liter of applied coating solids or 11.68 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this EU.

d. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

e. Emission Limitation:

The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions.

Applicable Compliance Method:

The permittee shall determine the RTO temperature requirements and destruction efficiency claimed through the testing requirements in section f)(2).

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA DO/LAA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 appropriate Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within three months 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 DO/LAA.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

(3) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).

g) Miscellaneous Requirements

(1) None.

4. K015, Topcoat (Enamel) system #1

Operations, Property and/or Equipment Description:

Topcoat (Enamel) booth No. 1 and oven

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MM	VOC emissions from each topcoat operation shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average. See d)(4, d)(7), e)(4), and f)(3).
b.	OAC rule 3745-21-29(C)(1)(d)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations, as a daily volume-weighted average.
c.	OAC rule 3745-21-29(C)(1)(e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average. See b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
e.	OAC rule 3745-21-29(E)	Work practice requirements

		See B.12 and B.13 in the facility wide terms and conditions.
f.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(4), c)(5), d)(9) through d)(13) and e)(7).
g.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility–wide VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions apply to this EU. The PALs for VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions from this facility as specified in B.2.
h.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d., c)(4), d)(5), e)(5), and f)(1)d.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
j.	OAC rule 3745-31-05(F)	See b)(2)a.

(2) Additional Terms and Conditions

a. The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions. When a control efficiency is claimed, the control device shall be operated in accordance with applicable operating parameters identified in this permit. The RTO

temperature requirements and destruction efficiency claimed are determined by the testing requirements in section f)(2).

b. The permittee shall operate the waterwash control system whenever this EU is in operation.

c. This emissions limitation is a daily volume-weighted average of the entire combined primer-surfacer and topcoat coating operations (i.e., all spray booths, flash-off areas and bake ovens where primer-surface coatings and topcoat coatings are applied, dried, and cured, except those spray booths, flash-off areas and bake ovens in the final repair coating operations). This is an alternative emission limitation in place of the emission limitations separately applicable to primer-surfacer coating operations and topcoat coating operations at the facility.

d. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) These emissions units can apply in a wet sequence which is identified as the following: A 3-Wet booth is where Guidecoat primer, Basecoats and Clearcoats are applied to each vehicle body without heated flash-off zones or oven curing between application steps. The vehicle bodies will then be directed to the 3-Wet Oven (formerly Enamel Oven) where the applied coatings will be cured. The 3- wet sequence can be operated in the following manner:

a. EU K014 is adjoined to the front of the Topcoat booth (K015) to apply Guidecoat coatings in a “3-Wet” sequence.

(2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control PE.

(3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(4) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) In order to claim a control efficiency for this EU when calculating VOC emissions during a period of operation, the average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the EU was in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizers when the EU is in operation. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers, when the EU was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) The permittee shall maintain records for EU K015 that will enable, for each calendar day, the calculation of the daily VOC emission rates in both lbs VOC per day and lbs VOC per gallon of deposited solids, 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-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee shall perform such calculations on a daily basis and shall maintain records of the results of the calculations.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart MM, including the applicable parts for the following sections:

60.393	Performance test and compliance provisions.
60.394	Monitoring of emissions and operations.

(5) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

(6) The permittee shall maintain monthly records for EU K015 of the volume weighted average mass of the VOC per volume of applied coating solids and the calculations required by 40 CFR Part 60, Subpart MM, section 60.393.

(7) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates for EU K015 in lbs per month, and the rolling, 12-month VOC emission rate, in TPY.

(8) The permittee shall maintain daily records of the number of hours of operation for this EU.

(9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request. The permittee maintains documentation of manufacturer's recommendations, instructions, and/or operating manual(s) through incorporation into the facility's maintenance management system.

(10) The permittee shall conduct periodic inspections of the waterwash control 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the

manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(12) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. 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 DO/LAA upon request.

(13) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the EU was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

(2) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(3) The permittee shall also submit annual reports that specify the total VOC emissions from EU K015 for the previous calendar year. These reports shall be submitted by January 31 of each year.

(4) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart MM, including the applicable parts for the following sections:

60.395	Reporting and recordkeeping requirements.

(5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

(6) The permittee shall notify the appropriate Ohio EPA DO/LAA in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EU was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide $PM_{2.5}$ emissions shall not exceed 26.32 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine $PM_{2.5}$ emissions from this EU to establish a facility-wide $PM_{2.5}$ emission rate, the permittee shall conduct, or have conducted, representative $PM_{2.5}$ emission testing for this EU to establish the $PM_{2.5}$ emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201A and 202.

The $PM_{2.5}$ emission rate testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA DO/LAA that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA DO/LAA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 appropriate Ohio EPA DO/LAA's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA DO/LAA within three months 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 DO/LAA.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

VOC emissions shall not exceed 1.47 Kg per liter of applied coating solids or 12.27 lbs VOC per gallon of applied (deposited) solids, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this EU.

d. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

e. Emission Limitation:

The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions.

Applicable Compliance Method:

The permittee shall determine the RTO temperature requirements and destruction efficiency claimed through the testing requirements in section f)(2).

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA DO/LAA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance. The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

(3) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MM, including section 60.393(b).

g) Miscellaneous Requirements

(1) None.

5. K019, Wax and touchup booth (CV)

Operations, Property and/or Equipment Description:

Wax and touch-up booth (CV)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See c)(1), c)(2), d)(4) through d)(8) and e)(4).
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1), d)(2), and d)(9) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
d.	OAC rule 3745-21-29(C)(2)(c)	VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

		See B.12 in the facility-wide terms and conditions.
e.	OAC rule 3745-21-29(C)(2)(e)	VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating excluding water and exempt compounds. See B.12 in the facility-wide terms and conditions.
f.	OAC rule 3745-21-29(C)(2)(g)	VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating excluding water and exempt compounds. See B.12 in the facility-wide terms and conditions.
g.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
h.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)b., c)(3), d)(3), e)(4), and f)(1)d.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. OC emissions resulting from cleanup solvent usage is accounted for under EU P100.

b. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed

0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of PE whenever this EU is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) For coating operation subject to OAC rule 3745-21-29(C), the permittee shall collect and record the following information for each month for this EU:

a. the name and identification number of each coating, as applied;

b. the volume of each coating, as applied, in gallons;

c. the type of coating, as identified under OAC rule 3745-21-29 (C); and

d. all data, calculations, and test results (including USEPA method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

These records shall be maintained for five years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.

(2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for this EU:

a. the VOC content of each coating, as applied, in pounds per gallon, including water and exempt solvent;

b. the total VOC emissions from all coatings employed [summation of (d)(1)b. x d)(2)a.) for all coatings]; and

c. the total VOC emissions from all coatings employed [summation of d)(2)b for each month], in pounds or tons.

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request. The permittee maintains documentation of manufacturer's recommendations, instructions, and/or operating manual(s) through incorporation into the facility's maintenance management system.

(5) The permittee shall conduct periodic inspections of the dry particulate filter 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(6) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. 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 Ohio EPA Northeast District Office upon request.

(8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the EU was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(9) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates for EU K019 in lbs per month, and the rolling, 12-month VOC emission rate for the EU, in TPY.

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content from cavity wax, deadener, or underbody coating exceeded 5.4 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

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

(3) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EU was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(4) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions from cavity wax shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2). U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this EU.

b. Emission Limitation:

VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2). U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this EU.

c. Emission Limitation:

VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2). U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this EU.

d. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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), or the emissions from all

bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

g) Miscellaneous Requirements

(1) None.

6. K025, New vehicle E-coat system

Operations, Property and/or Equipment Description:

New vehicle E-coat system (dip tank and oven) controlled by an RTO

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MMa	See b)(2)b., c)(3), d)(6), e)(5), and f)(1)a. Work practice requirements for storage, mixing, and conveying. See c)(2).
b.	OAC rule 3745-21-29(C)(1)(a)	See b)(2)c.
c.	OAC rule 3745-21-29(E)	Work practice requirements. See B.12 and B.13 in the facility wide terms and conditions.
d.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2) and d)(3) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176)	See b)(2)d., c)(1), d)(7), e)(6), and f)(1)c.

	In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations/control measures specified in this section.	
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions:

a. The permittee uses a capture system and a regenerative thermal oxidizer to comply with the applicable emission limit specified under 40 CFR 63 Subpart MMa section 60.392a.

b. In accordance with 40 CFR 60.392a(a)(1), the permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions of the EDP prime coat operation in excess of:

i. 0.027 kilogram of VOC per liter of applied coating solids when RT is 0.16 or greater.

ii. 0.027 × 350(0.160−RT) kg of VOC per liter of applied coating solids when RT is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in 40 CFR 60.393(c)(1)(i)(E).

c. The permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio (R_T) is 0.16 or greater.

ii. $0.70 \times 350^{(0.160 - RT)}$ pounds of VOC per gallon of solids when R_T is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

d. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating

operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

(2) The permittee must develop and implement a work practice plan to minimize VOC emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under 40 CFR 60.392a(a). The plan must specify practices and procedures to ensure that, at a minimum, the elements specified below are implemented:

a. All VOC-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers;

b. The risk of spills of VOC-containing coatings, thinners, cleaning materials, and waste materials must be minimized;

c. VOC-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes;

d. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents; and

e. Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.

(3) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.392a	Standards for volatile organic compounds.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the EU is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the EU was in operation, was below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) The permittee shall collect and record the following information for each day for this EU:

a. The name and identification number of each material (coating, solvent, etc.) added to the E-Coat tank;

b. The VOC content, in pounds VOC per gallon and in pounds VOC per gallon of solids, of each material added to the E-Coat tank;

c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material added to the E-Coat tank;

d. The monthly, uncontrolled, volume-weighted average VOC content of all the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-09;

e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds VOC per gallon of solids. The daily, controlled VOC emission rate shall be calculated using (i) the daily, uncontrolled, volume-weighted average VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the EU was in compliance;

f. The total uncontrolled VOC emissions from all the materials added to the E-Coat tank, in pounds; and

g. The total, controlled VOC emissions from all the materials added to the E-Coat tank, in pounds. The controlled VOC emission rate shall be calculated using (i) the total VOC emissions from d)(3)f above and (ii) the overall control efficiency for the control equipment as determined during the most recent emissions test that demonstrated that the EU was in compliance.

(4) The permittee shall collect and record the following information for each month for this EU:

a. The name and identification number of each coating material added to the E-Coat tank;

b. The VOC content, in pound of VOC per gallon of solids, of each material added to the E-Coat tank;

c. The volume, in gallons, and the solids content, in gallon of solids per gallon, of each material employed;

d. The monthly, uncontrolled, volume-weighted average VOC content of the materials added to the E-Coat tank, in pounds VOC per gallon of solids, calculated in accordance with the appropriate equation in OAC rule 3745-21-10; and

e. The monthly, controlled volume-weighted average VOC content of the materials employed, in pounds of VOC per gallon of solids. The monthly, controlled VOC emission rate shall be calculated using (i) the monthly volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the EU was in compliance.

(5) For each EDP primer coating operation, calculate the turnover ratio (RT) when used to adjust the VOC emission limit as described in OAC rule 3745-21-29(C)(1)(a)(ii) and (C)(1)(a)(iii), by the following equation:

RT = VS / VE , truncated after three decimal places

Where:

VE = volume of EDP primer coating tank, in gallons.

Vs = volume of solids added to the EDP primer coating tank during the month, in gallons.

Vs = summation of (Ai,month)(Vi,solids) for i=1 to i=n

Ai,month= amount of material i added to the reservoir of the dip coater during a calendar month, expressed in gallons.

Vi,solids= volume fraction of solids (nonvolatile matter) in material i.

i = subscript denoting a specific material (coating or thinner) added to the reservoir of the dip coater during the calendar month.

n = total number of materials (coatings and thinners) added to the reservoir of the dip coater during the calendar month.

Then calculate or select the appropriate limit according to OAC Rule 3745-21-29 (C)(1)(a).

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.393a	Performance test and compliance provisions.
60.394a	Add-on control device operating limits and monitoring requirements.

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above.

(2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)c of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(3) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of any monthly record showing that the calculated, controlled, volume-weighted VOC content exceeded the VOC emission limitation specified in section b)(2)b of these terms and conditions. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(4) The permittee shall also submit annual reports that specify the total VOC emissions from this EU during the previous calendar year. These reports shall be submitted by January 31 of each year.

(5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.395a	Notifications, reports, and records.

(6) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

In accordance with 40 CFR 60.392a, the permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.027 kilogram of VOC per liter of applied coating solids when RT is 0.16 or greater.

ii. 0.027 × 350(0.160−RT) kg of VOC per liter of applied coating solids when RT is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in 40 CFR 60.393(c)(1)(i)(E).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in 40 CFR 60.393.

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.393a	Performance test and compliance provisions
60.396a	Add-on control device destruction efficiency
60.397a	Emissions capture system efficiency

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

b. Emission Limitation:

The permittee shall not discharge or cause the discharge into the atmosphere from this EU VOC emissions in excess of:

i. 0.70 pound of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio (R_T) is 0.16 or greater.

ii. $0.70 \times 350^{(0.160 - RT)}$ pounds of VOC per gallon of solids when R_T is greater than or equal to 0.040 and less than 0.160.

iii. When R_T is less than 0.040, there is no emission limit.

R_T is calculated in accordance with the equation in OAC rule 3745-21-29(F)(5).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d) and the methods and procedures in OAC rule 3745-21-29(F).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to

test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

g) Miscellaneous Requirements

(1) None.

7. K029, New vehicle topcoat system

Operations, Property and/or Equipment Description:

New vehicle topcoat system

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MMa	VOC emissions from each topcoat operation shall not exceed 0.42 kilograms of VOC per liter of applied coating solids (3.53 pounds per gallon of applied coating solids), as a monthly volume-weighted average. See b)(2)a., d)(6), d)(8), e)(5), and f)(3). Work practice requirements for storage, mixing, and conveying. See c)(5).
b.	OAC rule 3745-21-29(C)(1)(d)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations, as a daily volume-weighted average.
c.	OAC rule 3745-21-29(C)(1)(e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average. See b)(2)c.
d.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is

		subject to a plant-wide applicability limit that has been approved by the director.
e.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
f.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(4), c)(5), d)(11) through d)(15) and e)(7).
g.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility–wide VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions apply to this EU. The PALs for VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(5), d)(8) and d)(9) contribute to the calculation of the total VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions from this facility as specified in B.2.
h.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d., d)(7), e)(6), and f)(1)d.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The permittee uses a capture system and a regenerative thermal oxidizer that includes a concentrator to comply with the applicable emission limit specified under 40 CFR 63 Subpart MMa section 60.392a.

b. The permittee shall operate the waterwash control system whenever this EU is in operation.

c. This emissions limitation is a daily volume-weighted average of the entire combined primer-surfacer and topcoat coating operations (i.e., all spray booths, flash-off areas and bake ovens where primer-surface coatings and topcoat coatings are applied, dried, and cured, except those spray booths, flash-off areas and bake ovens in the final repair coating operations). This is an alternative emission limitation in place of the emission limitations separately applicable to primer-surfacer coating operations and topcoat coating operations at the facility.

d. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) These emissions units can apply in a wet sequence which is identified as the following: A 3-Wet booth is where Guidecoat primer, Basecoats and Clearcoats are applied to each vehicle body without heated flash-off zones or oven curing between application steps. The vehicle bodies will then be directed to the 3-Wet Oven (formerly Enamel 2 Oven) where the applied coatings will be cured. The 3- wet sequence can be operated in the following manner:

a. EU K030 is adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.

(2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control PE.

(3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(4) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

(5) The permittee must develop and implement a work practice plan to minimize VOC emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under 40 CFR 60.392a(a). The plan must specify practices and procedures to ensure that, at a minimum, the elements specified below are implemented:

a. All VOC-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers;

b. The risk of spills of VOC-containing coatings, thinners, cleaning materials, and waste materials must be minimized;

c. VOC-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes;

d. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents; and

e. Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizers when the EU is in operation. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers, when the EU was in operation, was below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable minimum operating limit for the concentrator is 8 degrees Celsius (15 degrees Fahrenheit) below the average desorption gas inlet temperature, for any 3-hour block of time, maintained during the most recent emissions test that demonstrated the emissions unit was in compliance. You must keep the set point for the desorption gas inlet temperature no lower than 6 degrees Celsius (10 degrees Fahrenheit) below the lower of that set point during the performance test for that concentrator and the average desorption gas inlet temperature maintained during the most recent emissions test that demonstrated the emissions unit was in compliance.

(4) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the desorption gas inlet temperature when the EU is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average desorption gas inlet temperature was greater than 8 degrees Celsius (15 degrees Fahrenheit) below the average desorption gas inlet temperature maintained during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(5) The permittee shall maintain records that will enable, for each calendar day, the calculation of the daily VOC emission rates from each EU in both lbs VOC per day and lbs VOC per gallon of deposited solids, 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-453/R-08-002, September 2008) and any subsequent revisions thereof. The permittee

shall perform such calculations on a daily basis and shall maintain records of the results of the calculations.

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.393a	Performance test and compliance provisions.
60.394a	Monitoring of emissions and operations.

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

(8) The permittee shall maintain monthly records of the volume weighted average mass of VOC emitted per volume of applied coating solids after add-on controls and the calculations required by 40 CFR Part 60, Subpart MMa, section 60.393a.

(9) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates in lbs per month, and the rolling, 12-month VOC emission rates for each EU, in TPY.

(10) The permittee shall maintain daily records of the number of hours of operation for this EU.

(11) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request. The permittee maintains documentation of manufacturer's recommendations, instructions, and/or operating manual(s) through incorporation into the facility's maintenance management system.

(12) The permittee shall conduct periodic inspections of the waterwash control 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(13) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(14) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. 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 Ohio EPA Northeast District Office upon request.

(15) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the EU was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

(2) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the desorption gas inlet temperature of the concentrator does not comply with the temperature limitation specified above.

(3) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(4) The permittee shall also submit annual reports that specify the total VOC emissions from EU K029 for the previous calendar year. These reports shall be submitted by January 31 of each year.

(5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.395a	Reporting and recordkeeping requirements.

(6) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

(7) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EU was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide $PM_{2.5}$ emissions shall not exceed 26.32 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine $PM_{2.5}$ emissions from this EU to establish a facility-wide $PM_{2.5}$ emission rate, the permittee shall conduct, or have conducted, representative $PM_{2.5}$ emission testing for this EU to establish the $PM_{2.5}$ emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201A and 202.

The $PM_{2.5}$ emission rate testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to

test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

VOC emissions from each topcoat operation shall not exceed 0.42 kilograms of VOC per liter of applied coating solids (3.53 pounds per gallon of applied coating solids), as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for topcoat coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this EU.

d. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance. The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

(3) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MMa, including section 60.393a.

g) Miscellaneous Requirements

(1) None.

8. K030, New vehicle Guidecoat system

Operations, Property and/or Equipment Description:

New vehicle Guidecoat system (guidecoat booth and oven) controlled by an RTO

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart MMa	VOC emissions from each topcoat operation shall not exceed 0.35 kilograms of VOC per liter of applied coating solids (2.92 pounds per gallon of applied coating solids) from each guide coat operation. See b)(2)a., d)(6), e)(5), and f)(3). Work practice requirements for storage, mixing, and conveying. See c)(5).
b.	OAC rule 3745-21-29(C)(1)(c)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations as a daily volume-weighted average.
c.	OAC rule 3745-21-29(C)(1)(e)	VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average. See b)(2)c.
d.	OAC rule 3745-21-29(E)	Work practice requirements

		See B.12 and B.13 in the facility wide terms and conditions.
e.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
f.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule 3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)b, c)(2), c)(3), d)(8) through d)(12) and e)(7).
g.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility–wide VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions apply to this EU. The PALs for VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(3), d)(6) and d)(7) contribute to the calculation of the total VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions from this facility as specified in B.2.
h.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)d., c)(4), d)(7), e)(6), and f)(1)d.
i.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The permittee uses a capture system and a regenerative thermal oxidizer that includes a concentrator to comply with the applicable emission limit specified under 40 CFR 63 Subpart MMa section 60.392a.

b. The permittee shall operate the waterwash control system whenever this EU is in operation.

c. This emissions limitation is a daily volume-weighted average of the entire combined primer-surfacer and topcoat coating operations (i.e., all spray booths, flash-off areas and bake ovens where primer-surface coatings and topcoat coatings are applied, dried, and cured, except those spray booths, flash-off areas and bake ovens in the final repair coating operations). This is an alternative emission limitation in place of the emission limitations separately applicable to primer-surfacer coating operations and topcoat coating operations at the facility.

d. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) These emissions units can apply in a wet sequence which is identified as the following: A 3-Wet booth is where Guidecoat primer, Basecoats and Clearcoats are applied to each vehicle body without heated flash-off zones or oven curing between application steps. The vehicle bodies will then be directed to the 3-Wet Oven (formerly Enamel 2 Oven) where the applied coatings will be cured. The 3- wet sequence can be operated in the following manner:

a. EU K030 is adjoined to the front of the Topcoat booth to apply Guidecoat coatings in a "3-Wet" sequence.

(2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control PE.

(3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(4) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

(5) The permittee must develop and implement a work practice plan to minimize VOC emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under 40 CFR 60.392a(a). The plan must specify practices and procedures to ensure that, at a minimum, the elements specified below are implemented:

a. All VOC-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers;

b. The risk of spills of VOC-containing coatings, thinners, cleaning materials, and waste materials must be minimized;

c. VOC-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes;

d. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents; and

e. Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable average combustion temperature within the regenerative thermal oxidizers, for any 3-hour block of time, when the emissions unit controlled by the regenerative thermal oxidizers is in operation, shall not be below the average combustion temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizer when the EU is in operation. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the EU was in operation, was below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) In order to maintain compliance with the applicable emission limitations for VOC contained in this permit, the acceptable minimum operating limit for the concentrator is 8 degrees Celsius (15 degrees Fahrenheit) below the average desorption gas inlet temperature, for any 3-hour block of time, maintained during the most recent emissions test that demonstrated the emissions unit was in compliance. You must keep the set point for the desorption gas inlet temperature no lower than 6 degrees Celsius (10 degrees Fahrenheit) below the lower of that set point during the performance test for that concentrator and the average desorption gas inlet temperature maintained during the most recent emissions test that demonstrated the emissions unit was in compliance.

(4) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the desorption gas inlet temperature when the EU is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average desorption gas inlet temperature was greater than 8 degrees Celsius (15 degrees Fahrenheit) below the average desorption gas inlet temperature maintained during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(5) The permittee shall maintain records for EU K030 that will enable, for each calendar day, the calculation of the daily VOC emission rate for each EU in both lbs VOC per day and lbs VOC per gallon of deposited solids, 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-453/R-08-002, September 2008) and any subsequent revisions thereof. The

permittee shall perform such calculations on a daily basis and shall maintain records of the results of the calculations.

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.393a	Performance test and compliance provisions.
60.394a	Monitoring of emissions and operations.

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

(8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for EU K030 in lbs per month, and the rolling, 12-month VOC emission rate for each EU, in TPY.

(9) The permittee shall maintain daily records of the number of hours of operation for this EU.

(10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request. The permittee maintains documentation of manufacturer's recommendations, instructions, and/or operating manual(s) through incorporation into the facility's maintenance management system.

(11) The permittee shall conduct periodic inspections of the waterwash control 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the

manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(12) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(13) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. 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 Ohio EPA Northeast District Office upon request.

(14) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the EU was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modification made by the permittee. The records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

(2) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the desorption gas inlet temperature of the concentrator does not comply with the temperature limitation specified above.

(3) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of each daily record showing that the daily volume-weighted average VOC emissions limitation, in lbs VOC per gallon of deposited solids, has been exceeded. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(4) The permittee shall also submit annual reports that specify the total VOC emissions from EU K030 for the previous calendar year. These reports shall be submitted by January 31 of each year.

(5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.395a	Reporting and recordkeeping requirements.

(6) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

(7) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EU was in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide $PM_{2.5}$ emissions shall not exceed 26.32 TPY on a rolling, 12-month basis.

Applicable Compliance Method:

In order to determine $PM_{2.5}$ emissions from this EU to establish a facility-wide $PM_{2.5}$ emission rate, the permittee shall conduct, or have conducted, representative $PM_{2.5}$ emission testing for this EU to establish the $PM_{2.5}$ emission rate in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 201A and 202.

The $PM_{2.5}$ emission rate testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

b. Emission Limitation:

VOC emissions from each topcoat operation shall not exceed 0.35 kilograms of VOC per liter of applied coating solids (2.92 pounds per gallon of applied coating solids) from each guide coat operation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

VOC emissions shall not exceed 12.0 lbs per gallon of deposited solids for primer-surfacer coating operations and for combined primer-surfacer and topcoat coating operations, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this EU.

d. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District

Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

(3) The permittee shall comply with applicable performance test requirements required under 40 CFR Part 60, Subpart MMa, including section 60.393a.

g) Miscellaneous Requirements

(1) None.

9. K031, Lower Bodyside Coating System

Operations, Property and/or Equipment Description:

Lower Bodyside Coating System (coating booth and oven) vented to an RTO

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1), d)(2), and d)(3) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-21-29(C)(2)(g)	VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.
d.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
e.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this EU is an existing automobile, or new	In accordance with 40 CFR 63.3091(c) the average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010

	light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	kg/kg (lb/lb) of adhesive and sealer material used during each month. b)(2)b., c)(1), d)(3), e)(3), and f)(1)b.
f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
g.	OAC rule 3745-31-05(F)	See b)(2)a.

(2) Additional Terms and Conditions

a. The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions. When a control efficiency is claimed, the control device shall be operated in accordance with applicable operating parameters identified in this permit. The RTO temperature requirements and destruction efficiency claimed are determined by the testing requirements in section f)(2).

b. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) In order to claim a control efficiency for this EU when calculating VOC emissions during a period of operation, the average combustion temperature within the regenerative thermal oxidizer, for any 3-hour block of time, shall not be more than 28 degrees C below the average combustion temperature measured during the most recent emissions test that demonstrated the EU was in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperatures within the thermal oxidizer when the EU is in operation. 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 installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the EU was in operation, was more than 28 degrees C below the average combustion temperature during the most recent performance test that demonstrated the EU was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated EU was in operation.

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3168	What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?
63.3174	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?

(4) For coating operation subject to OAC rule 3745-21-29(C), the permittee shall collect and record the following information for each month for this EU:

a. the name and identification number of each coating, as applied;

b. the volume of each coating, as applied, in gallons;

c. the type of coating, as identified under OAC rule 3745-21-29 (C); and

d. all data, calculations, and test results (including USEPA method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

These records shall be maintained for five years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.

(5) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for EUs K031 in lbs per month, and the rolling, 12-month VOC emission rate for each EU, in TPY.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizers does not comply with the temperature limitation specified above.

(2) The permittee shall also submit annual reports that specify the total VOC emissions from each of EUs K031 for the previous calendar year. These reports shall be submitted by January 31 of each year.

(3) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4).

U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this EU.

b. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3165	How do I determine the emission capture system efficiency?
63.3166	How do I determine the add-on control device emission destruction or removal efficiency?
63.3167	How do I establish the add-on control device operating limits during performance tests?
63.3169	What are the requirements for a capture system or add-on control device which is not taken into account when demonstrating compliance with the applicable emission limitations?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

c. Emission Limitation:

The facility has requested a voluntary restriction to operate the regenerative thermal oxidizer at all times when a control efficiency is claimed when calculating VOC emissions.

Applicable Compliance Method:

The permittee shall determine the RTO temperature requirements and destruction efficiency claimed through the testing requirements in section f)(2).

(2) The permittee shall conduct, or have conducted, VOC emission testing for this EU to establish that the RTO is operating properly.

Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The 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). Capture efficiency testing shall be performed by the permittee whenever the permittee is required to perform transfer efficiency testing pursuant to U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light-Duty Truck Topcoat Operations" (EPA-453/R-08-002, September 2008) and any subsequent revisions thereof.

The VOC destruction efficiency testing shall be conducted, at a minimum, every 5 years.

During the emission testing, the EU shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

The permittee shall continuously monitor the combustion temperature within the thermal oxidizer during emissions testing to establish the average combustion temperature.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 Ohio EPA Northeast District Office within three months 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 Ohio EPA Northeast District Office.

The emission testing requirements for this EU are designed to obtain representative emission testing. However, it is recognized that circumstances or other reasons may arise that would necessitate changes to the testing requirements. Therefore, upon mutual agreement between the permittee and the Ohio EPA, the testing requirements specified in this permit may be changed.

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group - Air Supply Sources: B010, B011, B019, B023, B024, B025, B054, B056, B058, and B059

EU ID	Operations, Property and/or Equipment Description
B010	Direct-Fired Natural Gas Tutone and repair scuff booth air supply (13.6 MMBtu/hr)
B011	Direct-Fired Natural Gas Enamel Booth #1 air supply (88.0 MMBtu/hr)
B019	Air supply for wax and touchup spray booth (CV) (10.585 MMBtu/hr)
B023	Direct-Fired Natural Gas Body shop air supply (139.60 MMBtu/hr)
B024	Direct-Fired Natural Gas Trim shop air supply (80.36 MMBtu/hr)
B025	Direct-Fired Natural Gas Predelivery booth air supply (72.72 MMBtu/hr)
B054	Direct-Fired Natural Gas New Vehicle Prime air supply (20.83 MMBtu/hr)
B056	Direct-Fired Natural Gas New Vehicle air supply unit #1 (19.6 MMBtu/hr)
B058	Direct-Fired Natural Gas New Vehicle air supply unit #3 (17.6 MMBtu/hr)
B059	Direct-Fired Natural Gas New Vehicle air supply unit #4 (17.9 MMBtu/hr)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-17-07(A)	The requirements of this rule do not apply pursuant to OAC rule 3745-17-07(A)(3)(h).

c.	OAC rule 3745-17-10(B)(1)	The requirements of this rule do not apply to direct-fired units.
d.	OAC rule 3745-18-06(A)	There is no emission limitation for SO_2 in this rule for this EU.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility–wide VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions apply to this EU. The PALs for VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG are listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(2), d)(3), and d)(4) contribute to the calculation of the total VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII	See b)(2)a. and b)(2)b.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.
h.	OAC rule 3745-110-03	See b)(2)c.
i.	OAC rule 3745-31-05(D) Federally enforceable requirements to comply with OAC rule 3745-110-03(J)	See b)(2)c(iii), c)(2), d)(5), and e)(2) below.
j.	OAC rule 3745-110-03(J)	The emission limitation specified by this applicable rule is as stringent as the emission limitation established pursuant to OAC rule 3745-31-05(D). See b)(2)c below.

(2) Additional Terms and Conditions

a. The following EUs are associated with the EUs identified below, and shall comply with the applicable requirements of 40 CFR Part 63, Subpart IIII, identified in the terms and conditions for each respective associated EU in this permit:

i. B011 is associated with K015;

ii. B019 is associated with K019;

iii. B025 is associated with K021.

iv. B054 is associated with K030

v. B056, B058, and B059 are associated with K029

b. EUs B010, B023 and B024 are not associated with surface coating EUs and are therefore not subject to the requirements of 40 CFR Part 63, Subpart IIII.

c. The following is associated with OAC rule 3745-110-03:

i. For emissions units B010 and B019, the burners of the air supply sources and curing ovens at OHAP consist of multiple independent small burners. The burners for these emission units, in addition to B054, B056, B058, and B059, are exempt per OAC rule 3745-110-03(K)(16)(b) since they are a source other than a boiler, gas turbine or internal combustion engine that has the potential to emit less than 10 TPY.

ii. For EUs B023, B024, and B025, the emissions units are exempt per OAC rule 3745-110-03(K)(8) since the emissions units are space heating units.

iii. For EU B011,the burners of the air supply source consist of multiple independent small burners. All burners associated with B011 except for one are exempt from NOx RACT pursuant to OAC 3745-110-03(K)(16). Enamel #1 ASH #1 burner is subject to the requirements below:

As required by the reclassification to serious nonattainment for ozone under the 2015 ozone NAAQS promulgated by U.S. EPA, and pursuant to OAC rule 3745-110-03(J) and the NOX RACT Study submitted by Ford Motor Company - Ohio Assembly Plant on March 31, 2026 (subsequently revised on May 15, 2026, July 30, 2026 and July 31, 2026):

(a) "Ford Motor Company - Ohio Assembly Plant" (Facility ID: 0247030471) or any subsequent owner or operator of "Ford Motor Company - Ohio Assembly Plant" facility located at 650 Miller Road, Avon Lake, Ohio, shall comply with the following requirements for Enamel #1 ASH #1 burner associated with EU B011:

(b) Maintain and operate the burner in accordance with the manufacturer's specifications, with any modifications deemed necessary by the permittee, and with good combustion practices, to ensure efficient combustion for the control of NOx emissions from Enamel #1 ASH #1 burner associated with EU B011.

c) Operational Restrictions

(1) The permittee shall only employ NG and LPG as fuel in this EU.

(2) Install, maintain, and operate Enamel #1 ASH #1 burner associated with EU B011, in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee with good combustion practices to ensure efficient combustion for the control of NOX Enamel #1 ASH #1 burner associated with EU B011.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than NG or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this EU.

(2) The permittee shall maintain monthly records of the volumes of NG and LPG burned plantwide in this facility. The permittee shall calculate the prorated volumes of NG and LPG burned in this EU for the purpose of calculating monthly air pollution emissions.

The following formula shall be used to calculate the monthly prorated volume of each type of fuel burned in this EU:

MPV = (Xi/Sum of Xi) multiplied by TPV

where:

MPV = the monthly prorated volume of the fuel used, either NG or LPG;

Xi = the heat input capacity of this EU, in MMBtu/hr;

Sum of Xi = the summed total heat input, in MMBtu/hr of all operational combustion EUs located at this facility; and

TPV = the monthly, total plantwide volume of the fuel used, either NG or LPG.

(3) The permittee shall use emission factors from AP-42 to calculate monthly VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emissions. The permittee may use emission factors from other sources with prior approval from the Ohio EPA's Northeast District Office.

(4) The permittee shall maintain monthly records of the calculated, monthly VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emission rates for this EU in lbs per month, and the rolling, 12-month VOC, $PM_{2.5}$, PM/PM_{10}, NO_x, CO, SO_2 and GHG emission rates for this EU, in TPY.

NOTE: Since the monthly emission rates are determined based upon prorated volumes of NG burned which are based upon the utility provider's monthly billing statement, it is acceptable that monthly emission rate calculations may not be available until up to 60 days (approximately 2 months) after the end of any given month.

(5) In order to ensure Enamel #1 ASH #1 burner associated with EU B011, continues to operate as designed, the permittee shall operate burner in accordance with the manufacturer's recommendations, instructions, and operating manual(s) with any modifications deemed necessary by the permittee. These manufacturer's recommendations, instructions, and operating manual(s) with any modifications shall be maintained for the life of Enamel #1 ASH #1 burner associated with EU B011.

The permittee shall perform the recommended maintenance at the recommended intervals. The permittee shall keep records of the maintenance performed on Enamel #1 ASH #1 burner associated with EU B011and shall retain them for a period of five years from the date the record was created.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than NG or LPG was burned in this EU. Each report shall be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify each day Enamel #1 ASH #1 burner associated with EU B011, is not operated in accordance with the

manufacturer's specifications, or modifications deemed necessary by the permittee, and with good combustion practices for the control of NOx emissions.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

None.

Applicable Compliance Method

None.

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group - Final Repair Operations: K021 and K027

EU ID	Operations, Property and/or Equipment Description
K021	Spot Repair - Final Area (MPV)
K027	New vehicle final repair system

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-29(C)(1)(f)	VOC emissions final repair coating operations shall not exceed 4.8 lbs per gallon of coating, excluding water and exempt solvents. See B.12 in the facility-wide terms and conditions.
b.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
c.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
d.	OAC rule 3745-17-11(C)	OAC rule 3745-17-11(C) includes provisions specific to surface coating operations and indicates that any surface coating operation not identified in an exemption in OAC rule

		3745-17-11(A) shall follow the listed work practice standards in the rule. See b)(2)a, c)(1), c)(2), d)(2) through d)(6) and e)(3).
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(8) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
f.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)c., c)(3), d)(7), e)(4), and f)(1)b.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The permittee shall operate the dry filtration system for the control of PE whenever this EU is in operation.

b. OC emissions resulting from cleanup solvent usage is accounted for under EU P100.

c. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of PE whenever this EU is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for this EU:

a. For each coating in use at the facility:

i. the name and VOC content as received and as applied; and

ii. the type of coating, as identified under OAC rule 3745-21-29(C).

b. All data, calculations, and test results (including U.S. EPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The amount (gallons) of each coating used each month at the facility.

d. Records pertaining to a coating line subject to OAC rule 3745-21-29(C)(1)(f) in which the owner or operator elects to demonstrate the ongoing status of compliance with the applicable emission limitation by means of a daily volume-weighted average VOC content:

i. date of operation;

ii. the name and identification number of each coating, as applied on the date of operation;

iii. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied on the date of operation; and

iv. the daily volume-weighted average VOC content of all coatings, as applied on the date of operation, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$.

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modification deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request. The permittee maintains documentation of manufacturer's recommendations, instructions, and/or operating manual(s) through incorporation into the facility's maintenance management system.

(3) The permittee shall conduct periodic inspections of the dry particulate filter 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 or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(4) In addition to the recommended periodic inspection, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. 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 Ohio EPA Northeast District Office upon request.

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the EU was in operation, as well as, a record of all operations

during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?

(8) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for each EU K021 and K027 in lbs per month, and the rolling, 12-month VOC emission rate for each EU K021 and K027, in TPY.

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any monthly record showing that the VOC content of any of the coatings employed exceeded 4.8 lbs VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(2) The permittee shall submit annual reports that specify the total VOC emissions from each EU for the previous calendar year. These reports shall be submitted by January 31 of each year.

(3) The permittee shall notify the Appropriate Ohio EPA DO/LAA in writing of any daily record showing that the final repair booth dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EUs were in operation. The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

(4) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 4.8 lbs per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coating employed in this EU.

b. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group - Sealer Application Operation: K024 and K026

EU ID	Operations, Property and/or Equipment Description
K024	Sealer operations including a sealer deck, sealer application booth, and two ovens
K026	New vehicle Sealer Application Operation (sealer deck, 2 application booths and sealer oven)

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1), d)(2), and d)(3) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-21-29(C)(2)(d)	VOC emissions from sealer shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.
d.	OAC rule 3745-21-29(C)(2)(e)	VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.
e.	OAC rule 3745-21-29(C)(2)(g)	VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.
f.	OAC rule 3745-21-29(E)	Work practice requirements

		See B.12 and B.13 in the facility wide terms and conditions.
g.	40 CFR Part 63, Subpart IIII (63.3080 through 63.3176) In accordance with 40 CFR 63.3081(b), this EU is an existing automobile, or new light-duty truck, surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	In accordance with 40 CFR 63.3091(c) the average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month. See c)(1), d)(4), e)(2), and f)(1)d.
h.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. Applicable requirements for cleanup materials are accounted for in EU P100.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) For coating operation subject to OAC rule 3745-21-29 (C), the permittee shall collect and record the following information for each month for this EU:

a. the name and identification number of each coating, as applied;

b. the volume of each coating, as applied, in gallons;

c. the type of coating, as identified under OAC rule 3745-21-29 (C); and

d. all data, calculations, and test results (including USEPA method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

These records shall be maintained for five years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.

(2) For any coating operation subject OAC Rule 3745-21-29, sections (C)(1)(c), (C)(1)(d) or (C)(1)(e), the owner or operator shall maintain the records specified in "Protocol for determining the daily volatile organic compound emission rate of automobile and light-duty truck primer-surfacer and topcoat operations" (EPA-453/R-08-002).

These records shall be maintained for five years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.

(3) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for each EU:

a. the VOC content of each coating, as applied, in pounds per gallon, including water and exempt solvent;

b. the total VOC emissions from all coatings employed [summation of (d)(1)b. x d)(3)a.) for all coatings]; and

c. the total VOC emissions from all coatings employed [summation of d)(3)b for each month], in pounds or tons.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?

(5) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for each of EUs K024 and K026 in lbs per month, and the rolling, 12-month VOC emission rate for each EU, in TPY.

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the actual annual VOC emissions for this EU. The reports shall be submitted by January 31 of each year and cover the previous calendar year.

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?

63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions from sealer shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

b. Emission Limitation:

VOC emissions from deadener shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

VOC emissions from underbody coating shall not exceed 5.4 lbs per gallon of coating, excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

d. Emission Limitation:

In accordance with 40 CFR 63.3091(c) the average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems shall not exceed 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.

Applicable Compliance Method:

Compliance with the mass average organic HAP content for each compliance period shall be determined according to the methods and procedures of 40 CFR 63.3151.

(2) The “Test Procedure for Determining Bake Oven Exhaust Control Device VOC Loading for Specific Coatings”, section 21 of AAMA/USEPA document, “Protocol for Determining the Daily Volatile Organic Compound Emission Rate for Automobile and Light Duty Truck Topcoat Operation” shall be used to determine the VOC contents and VOC distribution of all coatings employed in this EU.

U.S. EPA Method 24 and/or formulation data shall be used to determine the VOC contents of all the coatings employed in this EU.

g) Miscellaneous Requirements

(1) None.

13. Emissions Unit Group - Windshield glass installation: K023 and K028

EU ID	Operations, Property and/or Equipment Description
K023	Windshield Glass Installation Process
K028	New vehicle Windshield glass installation

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(iv)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-21-29(C)(2)(a)	VOC emissions from glass bonding primer shall not exceed 7.5 lbs per gallon of coating, excluding water and exempt compounds.
c.	OAC rule 3745-21-29(C)(2)(b)	VOC emissions from adhesive shall not exceed 2.1 lbs per gallon of coating, excluding water and exempt compounds.
d.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1), d)(2)and d)(5) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.

f.	40 CFR Part 63, Subpart IIII In accordance with 40 CFR 63.3081(b), this EU is an existing automobile or light-duty truck surface coating operation located at a facility which is a major source of HAPs subject to the emission limitations and control measures specified in this section.	See b)(2)c., c)(1), d)(1), e)(2), and f)(1)c.
g.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The emission limitations listed above include emissions from vehicle flange and glass cleaners, primers, and adhesives.

b. The glass bonding primer designation in this permit refers to the new material the permittee has proposed to apply to the windshield which serves the combined function of cleaner and primer.

c. The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3094	What work practice standards must I meet?

d) Monitoring and/or Recordkeeping Requirements

(1) For coating operation subject to OAC rule 3745-21-29 (C), the permittee shall collect and record the following information for each month for each EU:

a. the name and identification number of each coating, as applied;

b. the volume of each coating, as applied, in gallons;

c. the type of coating, as identified under OAC rule 3745-21-29 (C); and

d. all data, calculations, and test results (including USEPA method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

These records shall be maintained for five years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.

(2) The permittee shall collect and record the following information for each month:

a. the VOC content of each coating and cleanup solvent, including water and exempt solvent, in pounds per gallon, as applied;

b. the number of gallons of each coating and cleanup solvent employed, including water and exempt solvents; and

c. the total VOC emission rate for all coatings and cleanup solvents, in pound [the summation of (a x b) for each coating and cleanup solvent].

(3) The permittee shall maintain an annual record of the total number of vehicles processed in each EU for the calendar year.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3100	What are my general requirements for complying with this subpart?
63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3171	How do I demonstrate initial compliance?
63.3173	How do I demonstrate continuous compliance with the emission limitations?

(5) The permittee shall maintain monthly records of the calculated, monthly VOC emission rate for each of EUs K023 and K028, in lbs per month, and the rolling, 12-month VOC emission rate for each EU, in TPY.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of noncomplying coatings (greater than 7.5 pounds VOC per gallon for glass bonding primer and greater than 2.1 pounds VOC per gallon for adhesives). The notification shall include a copy of such record and be made as part of the quarterly deviation reporting requirements in section A.9 of the Standard terms and conditions.

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

(3) The permittee shall submit annual reports to the Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Air Toxic Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the EU(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

(4) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 7.5 pounds per gallon of coating (glass bonding primer), excluding water and exempt compounds, used for the installation of any glass windows during the assembly of automobiles.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

b. Emission Limitation:

VOC emissions shall not exceed 2.1 pounds per gallon of coating (adhesive), excluding water and exempt compounds.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of all the coatings employed in this EU. Method 24 data from the supplier may be used to determine the VOC contents of all coatings employed in this EU.

c. Emission Limitation:

The combined organic HAP emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 40 CFR 63.3082(c), shall not exceed 0.072 kilogram per liter (0.60 pound per gallon) of coating solids deposited during each month, as determined according to the requirements in 63.3161;

or

If each individual material added to the electrodeposition primer system contains no more than 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 CFR1910.1200(d)(4), or the emissions from all bake ovens used to cure electrodeposition primers are captured and ducted to a control device having a destruction or removal efficiency of at least 95 percent, the combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to 63.3082(c) shall not exceed 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month, determined according to the requirements in 63.3171.

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3163	How do I conduct periodic performance tests and demonstrate continuous compliance with the emission limitations?
63.3164	What are the general requirements for performance tests?
63.3170	By what date must I conduct performance tests and other initial compliance demonstrations?

g) Miscellaneous Requirements

(1) None.

14. Emissions Unit Group - Wipe, Purge and Clean: P013, P100 and P102

EU ID	Operations, Property and/or Equipment Description
P013	Solvent wipe
P100	Organic compound emissions resulting from cleaning and purging of the equipment associated with emissions units K007 through K020
P102	New vehicle purge and clean

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	BAT is not required for any existing, new, or modified air contaminant source that is subject to a plant-wide applicability limit that has been approved by the director.
b.	OAC rule 3745-21-29(E)	Work practice requirements See B.12 and B.13 in the facility wide terms and conditions.
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this EU. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in d)(1) and d)(2) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
d.	40 CFR Part 60, Subpart MMa	For emission units P013 and P102 see b)(2)a. See d)(4) and e)(2).
e.	40 CFR Part 63, Subpart IIII	See b)(2)b., d)(5), and e)(2).

f.	40 CFR Part 63, Subpart A (63.1 through 63.16)	Table 2 to Subpart IIII of 40 CFR Part 63 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.16 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable restrictions for P013 and P102 required under 40 CFR Part 60, Subpart MMa, including the following sections:

60.392a(c)	Work practices for cleaning and purging
60.392a(c)(1)(i)	Vehicle body wipe emissions plan techniques
60.392a(c)(1)(ii)	Coating line purging emissions plan techniques
60.392a(c)(1)(iii)	Flushing of coating systems plan techniques
60.392a(c)(1)(iv)	Cleaning of spray booth grates plan techniques
60.392a(c)(1)(v)	Cleaning of spray booth walls plan techniques
60.392a(c)(1)(vi)	Cleaning of spray booth equipment plan techniques
60.392a(c)(1)(vii)	Cleaning of external spray booth areas plan techniques
60.392a(c)(1)(viii)	Housekeeping measures not addressed in paragraphs (c)(1)(i) through (vii) plan techniques

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

63.3094	Work Practice Standards

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for EU P013 for each month:

a. the name and identification number of each solvent wipe material, as applied;

b. the volume, in gallons, of each solvent wipe material, as applied;

c. the VOC content of each solvent wipe material, as applied, in pounds per gallon; and

d. the total VOC emissions from all solvent wipe materials employed [summation of (b x c) for all solvent wipe materials], in pounds.

(2) The permittee shall collect and record the following information for each of EUs P100 and P102 for each month:

a. the name and identification number of each purge and cleanup material, as applied;

b. the volume, in gallons, of each purge and cleanup material, as applied;

c. the VOC content of each purge and cleanup material, as applied, in pounds per gallon; and

d. the total VOC emissions from all purge and cleanup materials employed [summation of (b x c) for all purge and cleanup materials], in pounds.

(3) The permittee shall maintain monthly records of the calculated, monthly VOC emission rates for each of EUs P013, P100 and P102 in lbs per month, and the rolling, 12-month VOC emission rates for each EU, in TPY.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements for P013 and P102 pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.395a	Notifications, reports, and records.

(5) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3130	What records must I keep?
63.3131	In what form and for how long must I keep my records?
63.3160	By what date must I conduct initial performance tests and other initial compliance demonstrations?
63.3171(c)	Compliance with work practice requirements
63.3173	How do I demonstrate continuous compliance with the emission limitations?

e) Reporting Requirements

(1) The permittee shall also submit annual reports that specify the total VOC emissions from each of EUs P013, P100 and P102 for the previous calendar year. These reports shall include the calculations of the annual emissions and shall be submitted by January 31 of each year.

(2) The permittee shall comply with the applicable reporting requirements for P013 and P102 pursuant to 40 CFR Part 60, Subpart MMa, including the applicable parts for the following sections:

60.395a	Notifications, reports, and records.

(3) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart IIII, including the applicable parts for the following sections:

63.3110	What notifications must I submit?
63.3120	What reports must I submit?

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Formulation data shall be used to determine the VOC contents of all the materials employed in this EU.

g) Miscellaneous Requirements

(1) None.

NO_X REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) STUDY

Ford Motor Company / Ohio Assembly Plant

Prepared By:

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Trinity Consultants

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1. BACKGROUND

1.1 Reasonably Available Control Technology (RACT) Study

On March 25, 2022, Ohio EPA promulgated revisions to the existing NO_x regulations under Chapter 3745-110 of the Ohio Administrative Code (OAC) following the reclassification of the Cleveland area to moderate nonattainment for the 2015 8-hour Ozone National Ambient Air Quality Standard (NAAQS), as well as the reclassification of the Cincinnati area to marginal nonattainment.

For affected NO_x-emitting sources that were not subject to presumptive emission limits and were not otherwise exempt, or for sources subject to presumptive NO_x RACT emission limits where the owner or operator claimed the applicable limit was technically infeasible and/or economically unreasonable (i.e., not cost-effective), the owner or operator was required to conduct a detailed engineering study. This study was required to evaluate the technical and economic feasibility of reducing NO_x emissions and to establish RACT for the affected sources. As detailed in Appendix E, Ford reviewed NOx RACT applicability at its automobile manufacturing plant in Avon Lake, Ohio (referred to as the "Ohio Assembly Plant", or "OHAP") and determined that the only non-exempt equipment was a boiler meeting the definition of "small boilers" at OAC 3745-110-01(B)(39).

On April 1, 2025, Ohio EPA promulgated additional revisions to the NO_x regulations under Chapter 3745-110 of the OAC following the reclassification of the Cleveland area to serious nonattainment for the 2015 8-hour Ozone NAAQS. One of these revisions lowered the exemption threshold in OAC 3745-110-03(K)(16) from 25 tons per year (tpy) to 10 tpy for sources located in Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit counties. For sources at OHAP meeting the exemption of 10 tpy potential to emit (PTE) under OAC 3745-110-03(K)(16), potential emissions are well below the 10 TPY threshold and it is very unlikely any individual control or potential grouped control would be cost-effective. Therefore, no NOx RACT study is necessary for the exempt sources.

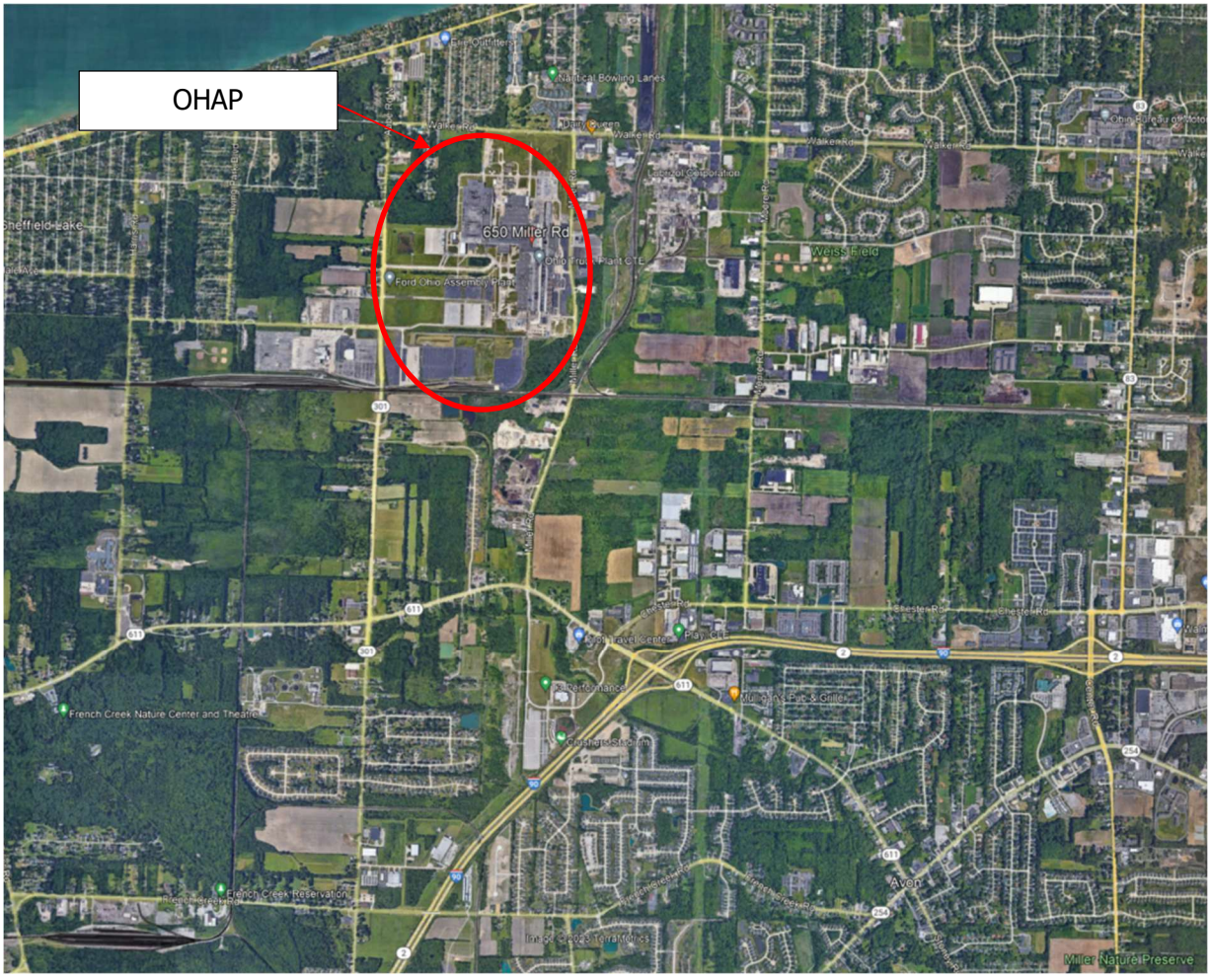
Ford operates a make-up air unit associated with Enamel Booth #1 that is equipped with a 29.92 MMBtu/hr natural gas-fired burner which was previously exempt from the requirements of OAC 3745-110 because its potential NO_x emissions were less than 25 tpy. However, due to the recent revision to the exemption threshold in OAC 3745-110-03(K)(16), this burner no longer qualifies for this exemption. Accordingly, Ford is submitting this RACT study for this burner in accordance with OAC 3745-110-03(J).

2. FACILITY OVERVIEW

Ford Motor Company (Ford) owns and operates an automobile manufacturing plant in Avon Lake, Ohio (referred to as the "Ohio Assembly Plant", or "OHAP"). Operations at OHAP are authorized under Ohio Environmental Protection Agency (Ohio EPA) Permit-to-Install (PTI) No. P0128281 (effective September 3, 2021) and Title V Operating Permit No. P0127361 (effective January 18, 2022).

OHAP is located at 650 Miller Road in Avon Lake, Ohio in Lorain County. Figure 2-1 is an area map that shows the site location relative to predominant geographical features such as highways and railroads.

Figure 2-1. OHAP Area Map



Facility information required by sections (a) through (d) of OAC 3745-110-03(J)(1) is provided as follows:

(a) The complete facility name, Ohio EPA facility identification number, and address:

Ford Motor Company – Ohio Assembly Plant
Facility ID 02-47-03-0471
650 Miller Road
Avon Lake, Ohio 44012

(b) The name, title, address and telephone number of the owner or operator's representative within the company who is the contact person for this facility regarding the engineering study and affected sources:

Andrew Kroll
Plant Environmental Control Engineer – Ohio Assembly Plant
Ford Motor Company
650 Miller Road
Avon Lake, Ohio 44012
Telephone Number: (*440) 933-1248*

(c) The name, title, address and telephone number of the official who is responsible for approval of the engineering study:

Tony Serra
Plant Manager – Ohio Assembly Plant
Ford Motor Company
650 Miller Road
Avon Lake, Ohio 44012
Telephone Number: (*440) 371-4346*

(d) The standard industrial classification code and source classification code numbers which are applicable to the facility's operation:

SIC: 3711
SCC: 1-05-001-06

2.1 Source Overview

The facility operates multiple direct-fired make-up air units (MUAs) that supply heated air to Enamel Booth #1. These units utilize natural gas-fired burners to heat incoming ambient air, which is then delivered directly to the coating booth to maintain appropriate temperature, airflow, and pressure conditions required for coating application and curing.

In a direct-fired configuration, the burner flame is located within the airstream, and the products of combustion are mixed with the supply air prior to entering the booth. The heated air is distributed through the booth zone to support coating operations and is subsequently exhausted through the specific booth zone ventilation stack.

Historically, a total of seven (7) direct-fired burners are used to provide make-up air to Enamel Booth #1. Collectively, these burners are grouped under Ohio EPA emission unit ID B011. The individual burners, along with their respective heat input capacities and potential NOx emissions, are presented in Table 2-1.

Table 2-1. Enamel Booth #1 Burner Summary

OEPA EU ID	Emission Unit Description	Burner Description	Burner Size (MMBtu/hr)	Potential NO_X Emissions (tpy)
B011	Direct-Fired Natural Gas Enamel Booth #1 Air Supply	Enamel #1 ASH #1	29.92	12.75
		Enamel #1 ASH #2	8.36	3.56
		Enamel #1 ASH #3	8.36	3.56
		Enamel #1 ASH #4	12.32	5.25
		Enamel #1 ASH #5	18.92	8.06
		Enamel #1 ASH #6	13.20	5.62
		Enamel #1 ASH #7	18.48	7.87

As shown in Table 2-1, the burners vary in size and associated potential NOx emissions. This RACT evaluation focuses on a single burner within emission unit B011. The affected burner (Enamel #1 ASH #1) is the only individual burner with a PTE greater than 10 tpy of NOx. The remaining burners within B011 have PTE values below 10 tpy and are therefore exempt from NOx RACT pursuant to OAC 3745-110-03(K)(16).

Ford notes that two (2) of the burners associated with B011 have been removed. Specifically, the Enamel #1 ASH #2 (8.36 MMBtu/hr) and Enamel #1 ASH #6 (13.20 MMBtu/hr) burners have been removed from the make-up air unit. Although the burners have been removed, they are identified above since they are evaluated as part of the NOx emissions and production info included in Appendix B.

B011 now includes five (5) separate air supply handling unit burners. Although these burners are similar in design and function, each operates independently to provide conditioned air to separate sections or operating zones of the paint booth system. The burners are not manifolded to a common combustion system, do not share a common exhaust stream, and are not controlled through a single integrated combustion control device. Each burner has its own dedicated fuel supply, burner management system, temperature controls, and operational parameters necessary to maintain specific process conditions within the respective booth section served. Make-up air entering the spray zone does not mix with other zones as the system operates as a downdraft booth to prevent air from moving from zone to zone. As a result, the burners cannot reasonably be commonly controlled as a single emissions unit for purposes of add-on control evaluation, and the RACT analysis was therefore appropriately performed for the individual burner that exceeded the applicability threshold under OAC Rule 3745-110-03(K)(16).

Source information required pursuant to OAC 3745-110-03(J)(1)(g) is provided in Appendix B. This information is presented for the entire emission unit B011; however, the RACT evaluation contained herein is limited to ASH #1, as discussed above.

3. RACT DEFINITION AND METHODOLOGY

"RACT," "BACT," and "LAER" are acronyms for different levels of emissions control. The least stringent is RACT, more stringent is BACT, and the most stringent is LAER. The type of control required depends on the size of the stationary source and whether it is in an attainment or nonattainment area (NAA).

- RACT, or Reasonably Available Control Technology, is required on new minor sources in Ohio and on existing major sources of NO_X and VOC in the ozone NAA.
- BACT, or Best Available Control Technology, is required for new major stationary sources and major modifications in attainment areas subject to Prevention of Significant Deterioration (PSD) permitting requirements.
- LAER, or Lowest Achievable Emission Rate, is required for new major stationary sources and major modifications in non-attainment areas subject to Nonattainment New Source Review permitting requirements.

At the federal level, RACT is not defined by statute or rule, rather it is defined in EPA guidance as "the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility."[1]

Considering this definition, RACT involves identifying implementable control technologies with due consideration given to technological and economic feasibility. Since RACT considers the technological and economic impacts of controls, the analysis and determination may differ from source to source and location to location.

3.1 Top-down Approach

In this RACT study, Ford is using the U.S. Environmental Protection Agency's (USEPA's) top-down approach to determining the feasibility of control technology where the most stringent control available for a similar or identical source or source category is identified. This control option is used to establish the RACT emission limitation, unless the applicant can demonstrate (and the permitting authority agrees) that it is not "achievable" due to technical infeasibility or not being cost effective and potentially having other adverse environmental or energy consequences of implementing the technology. If the top control alternative is eliminated, then the next most stringent level of control is evaluated. This process continues until RACT is selected. The five steps in a top-down RACT evaluation can be summarized as follows:

- Step 1. Identify all possible control technologies
- Step 2. Eliminate technically infeasible options
- Step 3. Rank the technically feasible control technologies based upon emission reduction potential
- Step 4. Evaluate ranked controls based on energy, environmental, and/or economic considerations
- Step 5. Select RACT

The following sections contain a description of the five (5) basic steps of this "top-down" approach.

[1] 44 Fed. Reg. 53762 (9/17/1979)

3.1.1 Step 1 – Identify All Control Options

In this step, available control technologies with the practical potential for application to the emission unit and regulated air pollutant in question are identified. The selected control technologies vary widely depending on the process technology and pollutant being controlled. The application of demonstrated control technologies in other similar source categories to the emission unit in question may also be considered in this step.

The following resources are typically consulted when identifying potential technologies for criteria pollutants:

- EPA's RACT/BACT/LAER Clearinghouse (RBLC) database
- NSPS, NESHAP, and RACT regulations for similar operations
- Engineering experience with similar control applications
- Information provided by air pollution control equipment vendors with significant market share in the industry

3.1.2 Step 2 – Eliminate Technically Infeasible Options

In this step, "technically infeasible" control options from the list of "potentially available" control options are eliminated. A control option is "technically feasible" if it has been "demonstrated" or if it is both "available" and "applicable."

3.1.3 Step 3 – Rank Remaining Control Options

All remaining technically feasible control options are ranked based on their overall control effectiveness for the pollutant under review. If there is only one remaining option or if all the remaining technologies could achieve equivalent control efficiencies, ranking based on control efficiency is not required. Collateral effects are usually not considered until step four of the five step top-down RACT analysis.

3.1.4 Step 4 – Evaluation of Most Effective Control Option

After identifying and ranking available and technically feasible control technologies, the economic, environmental, and energy impacts are evaluated to select the best control option. If collateral impacts do not disqualify the top-ranked option from consideration, it is selected as the basis for the RACT limit. Alternatively, in the judgment of the permitting agency, if economic, environmental, or energy considerations impact the top control option, the next most stringent option is evaluated. This process continues until a control technology is identified. This step validates the suitability of the top control option identified or provides a clear justification as to why the top option should not be selected as RACT.

3.1.5 Step 5 – Select RACT

In the final step, the RACT is determined for each emission unit under review based on evaluations from the previous step.

4. NO_X TOP-DOWN RACT STUDY

This section includes a top-down NOx RACT analysis for Enamel #1 ASH #1.

4.1 Overview of Potentially Applicable NO_X Control Technologies

NO_X control technologies can lower emissions by minimizing NO_X formation or reducing emissions to atmosphere after it is generated. Thermal NO_X is formed through high temperature oxidation of nitrogen found in the combustion air. The rate at which NO_X is formed depends on the reaction temperature, nitrogen and oxygen concentrations, as well as the residence time at a given temperature. The concentration of thermal NO_X can be controlled by regulating the nitrogen and oxygen molar concentrations as well as the combustion temperature. Fuel NO_X is formed by the reaction of burning fuels that contain nitrogen with oxygen in the combustion air. Fuel NO_X can be controlled by utilizing other types of fuels that contain lower nitrogen such as blast furnace gas, reducing flame temperatures as well as reducing excess oxygen. Lastly, prompt NO_X is formed during the early stages of combustion and occurs in the presence of hydrocarbon radicals in fuel-rich flames.

OAC 3745-110-03(J)(1)(h) provides a list of at least 22 NO_X control measures that should be evaluated as part of the NO_X RACT study. However, not all of the listed control measures are applicable to ASH #1. The following sections outline the potential applicability of each of the listed NO_X control measures to ASH #1.

4.1.1 Close Coupled or Separated Over-Fire Ports

Close coupled or separated over-fire ports implement air staged combustion to create a fuel-rich mixture in the main combustion zone. Since the stoichiometric ratio between the combustion fuel and air is not proportional, the combustion temperature is reduced, which in turn lowers thermal NO_X formation. After all other stages of combustion take place, the excess air needed to complete combustion is admitted through over-fire ports mostly located above the highest level of burners in furnaces.

This control technology is designed for large boilers and furnaces with defined combustion chambers that allow for staged air injection. The subject unit consists of a direct-fired make-up air burner in which combustion occurs within the airstream without a discrete combustion chamber or residence time for staged combustion. As such, this option is not applicable for ASH #1.

4.1.2 Burners Out of Service (BOOS)

BOOS is a form of fuel staged combustion that reduces the formation of thermal NO_X by reducing combustion temperature. Staged combustion is achieved by having multiple burners out of service (i.e., not feeding fuel and instead supplying air or flue gas) and the balance of the fuel required to maintain the unit firing rate is achieved by the remaining burners. Some of the disadvantages of this technique include high CO emissions, potentially uneven temperature profiles, and oxygen imbalances.

The subject units are independent direct-fired make-up air burners that operate in separate airstreams without a shared combustion chamber. Accordingly, BOOS is not applicable.

4.1.3 Flue Gas Recirculation (FGR)

Flue Gas Recirculation is another type of NO_X control measure that reduces the formation of thermal NO_X by reducing combustion temperature. The flame temperature is lowered by recirculating cooled flue gas and diluting the oxygen content of the combustion air. The subject burner fires directly into the make-up air stream, and combustion products are mixed with the supply air rather than exhausted through a separate flue. Accordingly, there is no distinct flue-gas stream available for recirculation, and FGR is not applicable for this source.

4.1.4 Low-NO_X Burners (LNB) with External Flue Gas Recirculation

LNBs with external flue gas recirculation use cooled flue gases from the exhaust stacks to dilute the combustion process. The inert compounds in the flue gas streams (nitrogen, water vapor, and carbon dioxide) serve as heat sinks and can reduce combustion temperature significantly. The flue gas that is mixed with the combustion air enters the burners using adapted pipes. As noted in Section 4.1.3 above, FGR is not applicable for this source.

4.1.5 Steam/Water Injection

Steam/water injection is a type of control measure whereby water or steam is injected into the combustion zone to lower the flame temperature. This technology is typically used in gas turbines or large boilers with defined combustion chambers to reduce flame temperature and NOx formation. The subject unit is a direct-fired make-up air burner in which combustion occurs within the supply airstream, and any injected steam or water would be introduced directly into the process air delivered to the coating booth. This would adversely affect coating quality and process performance. Additionally, the burner design does not support implementation of steam or water injection. Accordingly, this control technology is not applicable for the subject source.

4.1.6 Dry Low NO_X Burners

Dry LNBs are special types of burners used to reduce NO_X emissions from gas fired turbines. The configuration of this control technology is only suitable for gas turbines. Ford does not operate emission sources for which this technology is applicable or feasible; as such, this control measure is not applicable for this study.

4.1.7 Ignition Timing Retard

Internal combustion engines use ignition timing to control maximum temperature and residence time. This control measure is not applicable or feasible for the affected source included in this RACT study.

4.1.8 Adjustment of Air/Fuel Ratio (for internal combustion engines only)

Internal combustion engines use air-to-fuel ratio to control maximum temperature and residence time, resulting in lower NO_X emissions. This control measure is not applicable or feasible for the affected source included in this RACT study.

4.1.9 Fuel Emulsification

Fuel emulsification is a type of NO_X control technology whereby thermal NO_X generation is reduced by decreasing the combustion temperatures. Reduction in combustion temperatures is achieved by injecting water into the liquid fuels burned in the combustion sources. This control measure is not applicable for the affected source included in this RACT study.

4.1.10 Separate Circuit After-Cooling

This control technology is applicable to internal combustion engines and works by adding a separate water circuit to cool the engine's intake air. This control measure is not applicable for the affected source included in this RACT study.

4.1.11 Non-Selective Catalytic Reduction (NSCR)

Non-selective catalytic reduction (NSCR) is a post-combustion NOx control technology that utilizes a catalyst to reduce NOx emissions through reactions with carbon monoxide (CO) and hydrocarbons (VOC) present in the exhaust stream. Effective NSCR operation requires combustion conditions near stoichiometric or slightly fuel-rich to provide sufficient reducing agents, as well as a consistent exhaust gas composition and temperature.

The subject unit is a direct-fired natural gas make-up air burner that operates under lean, high-excess-air conditions and produces a highly dilute exhaust stream with insufficient CO and hydrocarbons to support NSCR reactions. Accordingly, NSCR is not applicable to the affected burner.

4.1.12 Incineration (for sources other than boilers)

Incinerators are typically used to control emissions from facilities that operate paint lines or have hazardous waste. This control measure is not applicable for the affected source included in this RACT study.

4.1.13 Scrubbing (for sources other than boilers)

Wet scrubbers can control NO_X emissions from pickling operations using alkali in water, water alone, or hydrogen peroxide as the liquid that captures NO_X. This control measure is not applicable for the affected source included in this RACT study.

4.1.14 Process Modification

Process modification involves changes to the underlying process or operation to reduce emissions, such as altering raw materials, operating conditions, or production methods. For combustion sources, process modification may include changes to fuel type, operating schedules, or process requirements that influence emission formation.

Process modification is not applicable to the affected burner. The subject unit is a direct-fired natural gas make-up air burner that serves a critical support function for Enamel Booth #1 by providing heated air necessary to maintain proper temperature, airflow, and pressure conditions for coating application and curing. The use of natural gas represents the cleanest commercially available fuel for this application, and substitution with an alternative fuel would not result in lower NOx emissions. Additionally, modification of operating conditions, such as reducing heat input or airflow, would adversely impact coating quality and process performance and is not feasible.

4.1.15 Low Excess Air (LEA)

Low excess air operation is a combustion control technique used to reduce NOx emissions by minimizing the amount of excess air supplied to the combustion process, thereby lowering peak flame temperatures and reducing thermal NOx formation.

Low excess air is not applicable to the affected burner. The subject unit is a direct-fired make-up air burner that operates with a large volume of process air required to maintain proper airflow, temperature, and

pressure conditions within the coating booth. The combustion process is inherently conducted under high excess air conditions, and reduction of excess air is not feasible without adversely impacting booth operation and coating quality.

4.1.16 Gaseous Fuels Reburn

Fuel reburning is a NO_X control measure whereby cooled flue gas mixed with added fuel is injected back into the main combustion zone for chemical reduction of NO_X to thermal nitrogen. In addition to chemically reducing NO_X, the primary combustion temperature is lowered, reducing thermal NO_X formation.

This technology is typically applied to large boilers and furnaces with defined combustion chambers and sufficient residence time to support staged combustion. The subject unit is a direct-fired make-up air burner in which combustion occurs within a high-volume airstream without a defined combustion chamber or residence time for staged combustion. The burner configuration does not allow for the creation of distinct primary, reburn, and burnout zones required for reburning. Accordingly, this technology is not applicable or feasible for this source.

4.1.17 Mid-kiln Firing

This control measure is not applicable for the affected source included in this RACT study.

4.1.18 Mid-kiln Air Injection

This control measure is not applicable for the affected source included in this RACT study.

4.1.19 LNBs

LNBs implement fuel or air staging to reduce combustion temperatures and lower thermal NO_X formation. Air staging in the primary combustion zone creates "fuel-rich" combustion zones where the formation of NO_X is disrupted due to lack of oxygen and reduced combustion temperature. The additional air required for complete combustion is supplied outside the main combustion zone. Fuel staging works the opposite of air staging whereby the primary combustion zone is "fuel-lean". Under this condition, thermal NO_X formation is lowered due reduced combustion temperatures. Similar to air staging, the additional fuel required for complete combustion to take place is supplied downstream of the primary combustion zone.

A LNB is potentially applicable for the affected source. The technical feasibility of installing an LNB is discussed in the following sections.

4.1.20 Selective Catalytic Reduction (SCR)

SCR is a post-combustion, add-on control technology in which ammonia is injected into the flue gas streams upstream of the catalyst bed to reduce NO_X into elemental nitrogen and water. SCR systems employ metal-based catalysts with activated sites to increase the reduction rate of NO_X. Critical parameters which affect the reduction rate of NO_X include reaction temperature range, residence time available in the optimum temperature range, molar ratio of injected ammonia to uncontrolled NO_X, degree of mixing between ammonia and NO_X, and ammonia slip. The reaction temperature for the reduction reaction ranges between 480-800 °F with optimum NO_X removal occurring at approximately 700 °F. Efficient SCR systems require

stable flue gas streams in regard to temperature, flow rate, and NO_X concentrations. If designed and operated efficiently, SCR systems can reduce NO_X emissions by 70% - 90%.[2]

The technical feasibility of implementing SCR for the subject source is evaluated in the following section.

4.1.21 Selective Noncatalytic Reduction (SNCR)

Selective non-catalytic reduction (SNCR) is a post-combustion NOx control technology that reduces NOx emissions through the injection of a nitrogen-based reagent, typically ammonia or urea, into the combustion exhaust stream. The injected reagent reacts with NOx to form nitrogen (N_2) and water vapor (H_2O).

Effective NOx reduction using SNCR requires specific operating conditions, most notably a defined temperature window, typically in the range of approximately 1,600°F to 2,000°F, as well as sufficient residence time and mixing within the flue gas stream to allow the reduction reactions to occur. SNCR systems are most commonly applied to combustion sources with well-defined exhaust streams and high-temperature zones, such as large industrial boilers, process heaters, and furnaces.

The technical feasibility of implementing SNCR for the subject source is evaluated in the following section.

4.1.22 Fuel Switching

The order of fuels based on highest NO_X emissions is coal, oil, and natural gas. The affected burner operating at OHAP burns natural gas exclusively. Accordingly, fuel switching is not an option considered in this study.

4.1.23 RACT Alternatives

As part of the RACT evaluation, due diligence was performed to identify and assess potentially applicable control technologies and operational measures beyond those specifically discussed in the analysis. This review included evaluating information available through the U.S. EPA RACT/BACT/LAER Clearinghouse (RBLC), reviewing relevant sections of the U.S. EPA Air Pollution Control Cost Manual and AP-42 guidance, and considering commonly applied combustion and VOC control technologies for similar paint booth air handling operations. Based on this review, no additional control measures were identified for consideration beyond those already addressed in the RACT analysis.

4.2 Top-Down RACT Analysis

4.2.1 Step 1 – Identify All Control Options

As discussed in Section 4.1 above, the following technologies are potentially applicable for the Enamel #1 ASH #1 burner:

- SCR;
- SNCR; and
- LNB.

The technical feasibility of each of these options is discussed in Step 2 below.

[2] U.S. EPA Cost Control Manual, 2002. https://www.epa.gov/economic-and-cost-analysis-air-pollution-regulations/cost-reports-and-guidance-air-pollution#cost%20manual

4.2.2 Step 2 – Eliminate Technically Infeasible Options

4.2.2.1 SCR

As discussed in Section 4.1.20, SCR requires a defined exhaust gas stream with sufficient temperature, residence time, and pollutant concentration to support effective catalytic NOx reduction. The subject unit is a direct-fired natural gas make-up air burner in which combustion products are discharged directly into the supply airstream and subsequently exhausted through the paint booth ventilation system.

As a result, the exhaust stream associated with the burner is highly dilute and consists of large volumes of ventilation air combined with combustion products. This configuration does not provide a discrete flue gas stream suitable for reagent injection and catalyst installation. In addition, the exhaust gas temperature is significantly lower than the optimal operating range for SCR systems, and implementation would require substantial reheating of the exhaust stream.

The combination of low NOx concentration, high volumetric flow rate, lack of a defined exhaust stream, and inadequate temperature conditions renders SCR technically infeasible for the subject source. Accordingly, SCR is eliminated from further consideration as a control option.

4.2.2.2 SNCR

As discussed in prior sections, SNCR requires injection of a nitrogen-based reagent, such as ammonia or urea, into a defined exhaust gas stream within a specific temperature window, typically between approximately 1,600°F and 2,000°F, along with sufficient residence time and mixing to facilitate NOx reduction reactions.

The subject unit is a direct-fired natural gas make-up air burner in which combustion occurs within the supply airstream, and combustion products are subsequently exhausted through the paint booth ventilation system. This configuration does not provide a discrete high-temperature zone or defined exhaust stream suitable for reagent injection. Additionally, the exhaust gas temperature associated with the unit is significantly below the temperature range required for effective SNCR operation.

Furthermore, the exhaust stream is highly dilute due to the large volume of ventilation air, which limits the effectiveness of reagent-based NOx reduction and would require substantial system modifications to attempt implementation.

The lack of an appropriate temperature window, absence of a defined injection zone, insufficient residence time, and highly dilute exhaust stream render SNCR technically infeasible for the subject source. Accordingly, SNCR is eliminated from further consideration as a control option.

4.2.2.3 LNB

LNBs are a technically feasible option for this source and are carried forward for further evaluation as a potential NOx control option.

4.2.3 Step 3 – Rank Remaining Control Options

For the reasons discussed above, LNBs are the only control option evaluated further in this study.

4.2.4 Step 4 – Evaluation of Remaining Control Options

As discussed in the previous section, installation of a low-NOx burner (LNB) was evaluated as a potential control option for the Enamel #1 ASH #1 burner. The cost estimate for the LNB retrofit was developed by Ford engineers based on a scope of work prepared by a third-party vendor, Rudolph-Libbe (see Appendix D). The vendor-provided quote, which includes the burner, associated equipment, demolition, installation, and start-up, was used as the basis for direct costs. Additional indirect costs not included in the vendor's scope were estimated at 40 percent of direct costs, consistent with typical ranges presented in EPA's *Air Pollution Control Cost Manual*. Detailed cost-effectiveness calculations are provided in Appendix C.

A summary of the cost-effectiveness estimates for the affected source is shown in Table 4-1 below.

Table 4-1. Cost-Effectiveness of Installing LNB

Emission Unit ID	Burner	Total Capital Investment (TCI)	Total Annual Cost (TAC)	NO_X Removed (tpy)	Cost Effectiveness ($/ton)
B011	Enamel #1 ASH #1	$411,299	$60,900	6.55	$9,294

As shown in Table 4-1, the cost-effectiveness of installing an LNB for the affected burner is approximately $9,294 per ton of NOx removed. This value exceeds typical cost-effectiveness thresholds for combustion sources of this type. In addition, the Enamel #1 ASH #1 burner operates intermittently and at lower heat input rates than its capacity, causing actual NOx emissions to be significantly lower than the potential emissions used in this analysis, as documented in Appendix B. As a result, the cost-effectiveness presented above significantly overstates the actual emission reduction benefits that would be achieved through installation of an LNB. In fact, the cost-effectiveness value on a maximum actual emissions basis increases to almost $60,000/ton.

Ford also notes that the Ohio EPA–approved NOx RACT analysis for the Ross Incineration facility provides a relevant benchmark supporting the conclusion that a cost-effectiveness value of $9,294 per ton is not economically reasonable. In that analysis, SCR was evaluated at approximately $10,161 per ton of NOx removed (low end) and was determined by Ohio EPA to be not economically feasible, with no additional add-on controls required as RACT.[3] This value is directly comparable to the $9,294 per ton estimated here and demonstrates that Ohio EPA has rejected controls in this cost range. Given that the Ross Incineration source has significantly higher baseline emissions (and therefore more favorable cost-effectiveness due to economies of scale), the subject source's lower emissions further support the conclusion that $9,294 per ton is not economically reasonable.

Based on these considerations, installation of an LNB is not considered economically feasible for the subject source and is therefore eliminated from further consideration.

4.2.5 Step 5 – Select RACT

There are no remaining technically and economically feasible control options for the B011 Enamel #1 ASH #1 Burner.

[3] U.S. EPA, *Air Plan Approval; Ohio; Source-Specific Non-CTG RACT and SIP Strengthening for Ohio*, 91 Fed. Reg. 9771 (Feb. 27, 2026).

4.3 Summary of RACT Determinations

Based on the evaluation of available NOx control technologies, RACT for the Enamel #1 ASH #1 burner is defined as the continued implementation of good combustion practices. This includes proper operation and maintenance of the burner and associated control systems in accordance with manufacturer specifications and good engineering practices to ensure efficient combustion and minimize NOx emissions. Ford will implement the proposed RACT immediately, as these practices are already in place.

APPENDIX A. POTENTIAL NO_X EMISSIONS

Ford Motor Company
Ohio Assembly Plant (OHAP)
Lorain, OH
B011 Potential NOx Emissions

DIMENSIONAL ANALYSIS

Time Conversion	8,760	hrs/yr	
Mass Conversion	2,000	lb/ton	*NIST SP1038*

PROCESS DATA

Natural Gas Heat Content	1,028	MMBtu/MMCF

POTENTIAL PROCESS DATA

Emission Unit ID	Equipment Description	Heat Input Rating (MMBtu/hr)	Natural Gas Usage (MMCF/hr)	NOx Emission Factors (lb/MMCF)	Emission Factor Source	Potential NO_X Emissions (tpy)
B011	Enamel #1 ASH #1	29.92	0.029	100	AP-42, Chapter 1.4	12.75

[a] *Natural gas Usage (MMCF/hr) = Heat Input Rating (MMBtu/hr) / Natural Gas Heat Content (MMBtu/MMCF)*

[b] *Potential NOx Emissions (tpy) = Natural Gas Usage (MMCF/hr) x 8760 (hrs/yr) x NOx Emission Factor*

APPENDIX B. SOURCE INFORMATION

Appendix Table B-1. General Source Information

EU ID	Source Description	Burner	Application Number	Most Recent Emission Test	Installation Date (Month and Year)	Operating Schedule
B011	Enamel Booth #1 air supply	Enamel #1 ASH #1	A0063981	N/A – no testing has been performed	1/1989	24/5/50

Appendix Table B-2. Control Equipment Information

EU ID	Source Description	Burner	Control Equipment
B011	Enamel Booth #1 air supply	Enamel #1 ASH #1	None

Appendix Table B-3. Average and Maximum Daily and Annual Production Rates[a]

OEPA Emission Unit ID	Average Daily Production Rates (MMCF/day)			Maximum Daily Production Rates (MMCF/day)			Annual Production Rates (MMCF/yr)		
	2023	2024	2025	2023	2024	2025	2023	2024	2025
B011	0.15	0.16	0.22	2.56	2.56	2.56	37.94	38.84	53.74

a. Per OAC 3745-110-03(J)(1)(g), production rates are to be provided for each of the three full calendar years preceding the submission of this RACT study.

Appendix Table B-4. Average Daily, Maximum Daily, and Annual NO_x Emissions

OEPA Emission Unit ID	Average Daily NO_x Emissions (lb/day)	Maximum Daily NO_x Emissions (lb/day)	Annual NO_x Emissions (tpy)
B011	21.93	255.78	2.69

a. Per OAC 3745-110-03(J)(1)(g), emissions information should be based on the three calendar years preceding the effective date of the rule, or any other year that may be representative. Accordingly, the emissions presented in this table for those units are based on years 2023-2025.

Appendix Figure B-1. Plot Plan

APPENDIX C. COST CALCULATIONS

Ford Motor Company
Ohio Assembly Plant (OHAP)
Lorain, OH
Low-NOx Burner Cost Effectiveness - B011 Enamel #1 ASH #1

DIMENSIONAL ANALYSIS

Time Conversion	8,760	hours/year	
Mass Conversion	2,000	lb/ton	*NIST SP1038*

ASSUMPTIONS

Cost Year	2025		
Equipment Life	15	yrs	*Control Strategy Tool (COST) "At a Glance" Control Measure Document from U.S. EPA Office of Air Quality Planning and Standards (OAQPS)*
Annual Interest Rate	6.75	%	*https://www.federalreserve.gov/releases/h15/*

INPUTS

Natural Gas Heat Content	1028	MMBtu/MMCF	
Existing Potential NOx Emission Rate	0.10	lb/MMBtu	*AP-42 Table 1.4-1, Small Boilers - Uncontrolled*
LNB Potential NOx Emission Rate	0.05	lb/MMBtu	*Assumed value for Low NOx Burner*
Burner Heat Input Capacity	29.92	MMBtu/hr	*Burner specifications*
NO_X Removed	6.55	tons/yr	*[Existing NOx EF (lb/MMBtu) - Proposed NOx EF (lb/MMBtu)] x Heat Input Rating (MMBtu/hr.) x 8760 (hrs/yr) / 2,000 (lb/ton)*
Capital recovery factor, CRF	0.1081		

TOTAL CAPITAL INVESTMENT

Total Direct Installation Costs	$293,785	*Vendor quote*
Total Indirect Installation Costs	$117,514	*Indirect installation costs assumed to be 40% of direct equipment/install costs based on common ranges presented in EPA's Cost Control Manual*
Total Capital Investment, TCI	**$ 411,299**	*=Total Direct Installation Costs + Indirect Installation Costs*

TOTAL ANNUAL COSTS

Direct Annual Costs			
Annual Maintenance Costs	$	-	
Annual Operator Labor Cost	$	-	
Total direct annual cost, DAC	$	-	
Indirect Annual Costs			
Annual Administrative Cost	$	8,226	*2% of TCI*
Property Tax	$	4,113	*1% of TCI*
Insurance	$	4,113	*1% of TCI*
Capital recovery, CR	$	44,448	
Total indirect annual costs, IDAC	$	60,900	
Total annual cost, TAC	$	60,900	*= DAC + IDAC*

COST EFFECTIVENESS

Annual cost in terms of NO_X removed - Potential	$	9,294.18	$/ton	*=TAC / NOx Removed (tpy)*

APPENDIX D. LOW NOX BURNER VENDOR QUOTE

RUDOLPH LIBBE INC
RUDOLPH LIBBE GROUP

An EEO Employer

March 4, 2026

Ford Motor Company
330 Town Center Drive
Dearborn, MI 48126
Attn: Mr. Ben Champagne
Re: **OHAP NAVL Enamel #1 Ash House Burner**

Dear Ben,

We are pleased to submit for your consideration our budget proposal to perform the below scope of work for the Ford OHAP Enamel #1 Ash House Burner Replacement.

Our scope of work includes:
Provide necessary labor, material and equipment to:

- Removal and reinstallation of sheet metal for burner access.
- Installation of scaffolding.
- Removal of existing burner and manifold.
- New gas manifold piping.
- Furnish and installation of new 29.92 MMBtu/hr capacity burner.
- Modifications required to the burner housing/profile ducting.
- Addition of a box enclosure. The new models do not come with the required enclosure.
- Furnishing and installing (2) new flame monitors. New regulations require new monitors and adding the second due to the length of the burner.
- F&I of a new keypad display to interface with both flame monitors.
- New solenoid valves and pilot regulators.
- Removal of scaffolding.
- Permitted confined space entry.
- Confined space rescue team.
- Burner start-up and balancing.
- Standby support (2 PF for 5-8 hour days, M-F).

Qualifications / Exclusions:
The above price shall remain firm, subject to acceptance, for thirty days from this date and, except as specifically noted, shall be subject to the following qualifications:

1. All work to be performed during normal working hours during the week Monday-Friday.
2. Rudolph/Libbe will have free and clear access to the site, with coordination of work areas
3. **We exclude any work with hazardous materials, if they are encountered**.
4. Our proposal is based on the assumption that the work is “personal property” and sales/use tax has been included on the material.
5. Extended warranty is excluded
6. Engineering of or modifications to existing systems is excluded
7. Duct work modifications is excluded
8. Work on Sundays and Holidays is excluded

Total budget of the work described above is $ 293,785.00

419.241.5000
6494 LATCHA ROAD
WALBRIDGE, OH 43465
RLGBUILDS.COM

RUDOLPH LIBBE INC
RUDOLPH LIBBE GROUP

An EEO Employer

Thank you for the opportunity to bid your project at the Ford Ohio Assembly Plant. If there are any questions, please feel free to contact me on my cell phone at 419-260-5701

Sincerely,

Patrick Carney
Project Manager
Rudolph/Libbe Inc.

419.241.5000
6494 LATCHA ROAD
WALBRIDGE, OH 43465
RLGBUILDS.COM

APPENDIX E. SUMMARY OF NOX EMITTING EMISSION UNITS

Combustion Emission Units - Nox RACT Evaluation

EU	Description	Capacity (MMBtu/hr)	NOx PTE (tpy)	Exemption
B004	**Phosphate Boilers**	**41.98 (20.992 each)**	-	**None - Facility complies with OAC 3745-110-03 (A) for small boilers**
B005	**Air supply for E-coat scuff booth (CV)**	**9.6**	**4.09**	**3745-110-03(K)(16)**
B010	**Direct-Fired Natural Gas Tutone and repair scuff booth air supply**	**13.6**	**5.79**	**3745-110-03(K)(16)**
B011	**Direct-Fired Natural Gas Enamel Booth #1 air supply**	**See Below**	**See Below**	**See Below**
	Enamel Booth #1 - ASH 1	29.92	12.84	NOx RACT Study completed for this Burner
	Enamel Booth #1 - ASH 3	8.36	3.59	3745-110-03(K)(16)
	Enamel Booth #1 - ASH 4	12.32	5.29	3745-110-03(K)(16)
	Enamel Booth #1 - ASH 5	18.92	8.12	3745-110-03(K)(16)
	Enamel Booth #1 - ASH 7	18.48	7.93	3745-110-03(K)(16)
B019	**Air supply for wax and touchup spray booth (CV)**	**10.59**	**4.51**	**3745-110-03(K)(16)**
B023	**Direct-Fired Natural Gas Body shop air supply HV units (139.60 MMBtu/hr)**	**139.6**	**-**	**3745-110-03(K)(8)**
B024	**Direct-Fired Natural Gas Trim shop air supply HV units (80.36 MMBtu/hr)**	**80.4**	**-**	**3745-110-03(K)(8)**
B025	**Direct-Fired Natural Gas Predelivery air supply HV units (72.72 MMBtu/hr)**	**72.72**	**-**	**3745-110-03(K)(8)**
B026	**Indirect-Fired Natural Gas Carbon desorption preheat burners - basecoat burner**	**5**	**2.13**	**3745-110-03(K)(16)**
B041	**179 Natural Gas Fired Space Heaters**	**4 to < 10 each**	-	**3745-110-03(K)(8)**
B048	**West Admin Boiler # 1:**	**4.06**	-	**3745-110-03(K)(1)**
B049	**West Admin Boiler #2:**	**4.06**	-	**3745-110-03(K)(1)**
N/A	**50 GAL. HOT WATER TANK (GAS) JANITORS RM**	**0.04**	**0.02**	**3745-110-03(K)(16)**
N/A	**98 GAL. HOT WATER TANK (GAS) JANITORS RM**	**0.2**	**0.09**	**3745-110-03(K)(16)**
N/A	**Hot Water Tank - Gas H12 Restrooms**	**0.04**	**0.02**	**3745-110-03(K)(16)**
N/A	**Hot Water Tank - Gas H21 Restrooms**	**0.2**	**0.09**	**3745-110-03(K)(16)**
N/A	**HOT WATER TANK GAS (K21) LOCKER ROOM**	**0.09**	**0.04**	**3745-110-03(K)(16)**
N/A	**W.Admin Chiller - Paint Locker Rooms**	**3.5**	**1.49**	**3745-110-03(K)(16)**
B050	**VOC Boiler**	**8.06**	-	**3745-110-03(K)(1)**
Booth RTO	**Enamel 1 Booth RTO**	**2.4**	**1.03**	**3745-110-03(K)(14)**
Enamel 1 Oven RTO	**Enamel 1 Oven RTO**	**16.2**	**6.95**	**3745-110-03(K)(14)**
Ecoat Oven RTO	**Ecoat Oven RTO**	**6.5**	**2.79**	**3745-110-03(K)(14)**
K007	**E-coat oven**	**See Below**	**See Below**	**See Below**
	E/COAT OVEN ZONE 1	3.000	1.28	3745-110-03(K)(16)
	E/COAT OVEN Agitation ZONE 1	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 2	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 3	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN Agitation ZONE 3	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 4	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 5	3.000	1.28	3745-110-03(K)(16)
	E/COAT OVEN ZONE 6	3.000	1.28	3745-110-03(K)(16)
	E/COAT OVEN ZONE 7	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 8	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 9	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 10	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 11	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 12	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 13	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 14	2.000	0.85	3745-110-03(K)(16)
	E/COAT OVEN ZONE 15	3.000	1.28	3745-110-03(K)(16)
K015	**Enamel 1 Oven**	**See Below**	**See Below**	**See Below**
	ENAMEL ONE ZONE 1	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 2	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 3	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 3/RADIANT ZONE	1.60	0.68	3745-110-03(K)(16)
	ENAMEL ONE ZONE 4	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 5	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 6	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 7	2.000	0.85	3745-110-03(K)(16)
	ENAMEL ONE ZONE 8	2.000	0.85	3745-110-03(K)(16)
K024	**Sealer Gel oven**	**14.5**	**6.22**	**3745-110-03(K)(16)**
B028	**Emergency Electrical Generator 1000-5E6009Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B030	**Emergency Electrical Generator 1000-5E6011Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B031	**Emergency Electrical Generator 1000-5E6012Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B032	**Emergency Electrical Generator 1000-5H03Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B033	**Emergency Electrical Generator 1000-5H04Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B034	**Emergency Electrical Generator 1000-5H05Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B035	**Emergency Fire Pump #2**	**260 Hp-hr**	-	**3745-110-03(K)(3)**
B038	**Emergency Electrical Generator 1000-5H06Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B039	**Emergency Electrical Generator 1000-5X13Subg**	**204 Hp-hr**	-	**3745-110-03(K)(3)**
B040	**Emergency Fire Pump #1**	**183 Hp-hr**	-	**3745-110-03(K)(3)**
P025	**Server Room Emergency Electrical Generator**	**75 Hp-hr**	-	**3745-110-03(K)(3)**
P101	**Emergency Electrical Generator 1000-5E6010Subg**	**89 Hp-hr**	-	**3745-110-03(K)(3)**

B053	**7.5 MMBtu/hr Natural Gas-Fired BEV-C Phosphate Boilers #1, #2, and #3**	**7.5 (each)**	-	**3745-110-03(K)(1)**
B054	**Direct-Fired Natural Gas New Vehicle Prime Booth air supply**	**20.83**	**6.66**	**3745-110-03(K)(16)**
B055	**Two Direct-Fired Natural Gas BEV-C Sealer Decks Air Supply (3.0 MMBtu/hr)**	**See Below**	**See Below**	**See Below**
	Burner 1	3	0.96	3745-110-03(K)(16)
	Burner 2	3	0.96	3745-110-03(K)(16)

Combustion Emission Units - Nox RACT Evaluation

EU	Description	Capacity (MMBtu/hr)	NOx PTE (tpy)	Exemption
B056	**Direct, Natural gas fired Air Supply Unit #1**	**19.6**	**6.26**	**3745-110-03(K)(16)**
B057	**Direct, Natural gas fired Air Supply Unit #2**	**7.4**	**2.37**	**3745-110-03(K)(16)**
B058	**Direct, Natural gas fired Air Supply Unit #3**	**17.6**	**5.61**	**3745-110-03(K)(16)**
B059	**Direct, Natural gas fired Air Supply Unit #4**	**17.9**	**5.71**	**3745-110-03(K)(16)**
B060	**6.0 MMBtu/hr Direct, Natural gas fired tackoff CAU**	**6**	**1.92**	**3745-110-03(K)(16)**
B061	**5.0 MMBtu/hr Direct, natural-gas fired clean room RAU**	**5**	**1.60**	**3745-110-03(K)(16)**
B062	**Seven Direct, natural-gas fired building space heaters - 3 heaters (10 MMBtu/hr each), 7 heaters (6 MMBtu/hr each)**	**72**	**-**	**3745-110-03(K)(8)**
K025	**BEV-C E-coat system (dip tank and oven) controlled by an RTO**	**See Below**	**See Below**	**See Below**
	Ecoat ZONE 1	3.15	1	3745-110-03(K)(16)
	Ecoat ZONE 2	3.15	1	3745-110-03(K)(16)
	Ecoat Zone 3A	3.15	1	3745-110-03(K)(16)
	Ecoat ZONE 3B	3.15	1	3745-110-03(K)(16)
	Ecoat ZONE 4	3.15	1	3745-110-03(K)(16)
	Ecoat ZONE 5	2.5	0.8	3745-110-03(K)(16)
	Ecoat ZONE 6	2.5	0.8	3745-110-03(K)(16)
	Ecoat ZONE 7	2.5	0.8	3745-110-03(K)(16)
	Ecoat Zone 8	2.5	0.8	3745-110-03(K)(16)
	Ecoat Zone 9	2.5	0.8	3745-110-03(K)(16)
	Ecoat Zone 10	2.5	0.8	3745-110-03(K)(16)
New product Enamel/Ecoat RTO	**New product Enamel/Ecoat RTO**	**16**	**6.87**	**3745-110-03(K)(14)**
K026	**New Vehicle Sealer Application Operation (sealer deck, 2 application booths and sealer oven)**	**14.5**	**4.6**	**3745-110-03(K)(16)**
K029, K030, K031	**New Vehicle Oven Heaters**	**See Below**	**See Below**	**See Below**
	Oven Zone 1	3.15	1	3745-110-03(K)(16)
	Oven Zone 2	3.15	1	3745-110-03(K)(16)
	Oven Zone 3	3.15	1	3745-110-03(K)(16)
	Oven Zone 4	3.15	1	3745-110-03(K)(16)
	Oven Zone 5	2.5	0.8	3745-110-03(K)(16)
	Oven Zone 6	2.5	0.8	3745-110-03(K)(16)
	Oven Zone 7	2.5	0.8	3745-110-03(K)(16)
	Oven Zone 8	2.5	0.8	3745-110-03(K)(16)
	Oven Zone 9	2.5	0.8	3745-110-03(K)(16)
	Oven Zone 10	2.5	0.8	3745-110-03(K)(16)
	Oven Zone 11	2.5	0.8	3745-110-03(K)(16)
	Oven Agitation Zone	3	1	3745-110-03(K)(16)

Public Notice
Ohio Environmental Protection Agency
Draft State Implementation Plan
NOx Reasonably Available Control Technology (RACT)
for Ford Motor Company - Ohio Assembly Plant (Facility ID 0247030471)

Lorain County

Notice is hereby given that the Director of the Ohio Environmental Protection Agency, (Ohio EPA) is submitting to the United States Environmental Protection Agency (U.S. EPA) Reasonably Available Control Technology (RACT) for Ford Motor Company - Ohio Assembly Plant (Facility ID 0247030471) for approval into Ohio's state implementation plan (SIP) for the 2015 ozone National Ambient Air Quality Standard (NAAQS).

On March 17, 2025, Ohio submitted a revision to Ohio's SIP to address RACT requirements for the 2015 8-hour ozone NAAQS. As noted in this submittal, Ohio Administrative Code (OAC) rule 3745-110-03(J) requires facilities that have the potential to emit of fifty tons per year or more, but less than one hundred tons per year of nitrogen oxides (NOx) and are located in nonattainment counties to submit a RACT study if they are not subject to the NOx RACT limits in OAC rule 3745-110-03(A) to OAC rule 3745-110-03(G), the exemptions under OAC rule 3745-110-03(K), or that are subject to the aforementioned presumptive NOx RACT limits but claim that they are technically infeasible or economically unreasonable to achieve.

Ohio is now submitting source-specific NOx RACT for Ford Motor Company - Ohio Assembly Plant (Facility ID 0247030471) for approval into Ohio's SIP. This facility is located in the Cleveland 2015 ozone maintenance area and has no prior existing source-specific RACT established in OAC rule 3745-110-03.

The updated RACT Study was submitted per OAC rule 3745-110-03(J). Ohio has determined that the updated RACT study, along with supplemental information submitted subsequently, is sufficient to justify the continued use of good combustion practices and proper operation of the burner and associated control systems in accordance with manufacturers specifications and good engineer practices to ensure efficient combustion proposed by the facility to act as RACT for the enamel #1 ash #1 burner under the 2015 ozone standard.

Ohio EPA is now requesting approval of the proposed RACT for Ford Motor Company - Ohio Assembly Plant into Ohio's SIP.

Ohio EPA is seeking public comment to satisfy U.S. EPA requirements for public involvement in SIP related activities in accordance with 40 CFR 51.102.

The public comment period will run until October 19, 2026. Written comments should be submitted at: https://ohioepa.commentinput.com - Search by entering the permit # (P0134100) in the "Search Projects" search box.

A public hearing on this action may be requested by contacting Kathryn Jobe at 614-728-0671 or kathryn.jobe@epa.ohio.gov no later than 30 days from the draft public notice. If a public hearing is requested, a new notification will be published to identify the time and location of the public hearing. The public hearing will be held at least 30 days after the date of the new notification.

All interested persons are entitled to comment on these changes. All comments submitted to the above address by the close of business 30 days from when the draft public notice is issued will be considered by Ohio EPA prior to final action on this action. Written statements submitted after this time period may be considered as time and circumstances permit but will not be part of the official record.

Questions or comments about this document should be directed to Kathryn Jobe at 614-728-0671 or kathryn.jobe@epa.ohio.gov.

DATE

Ms. Anne Vogel
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Revision to Ohio's Reasonably Available Control Technology (RACT) State Implementation Plan for the 2015 Ozone National Ambient Air Quality Standards – Source-Specific Nitrogen Oxide (NOx*)* RACT for Ford Motor Company - Ohio Assembly Plant (Facility ID 0247030471)

Dear Administrator Vogel:

On March 17, 2025, Ohio submitted a revision to Ohio's State Implementation Plan (SIP) to address Reasonably Available Control Technology (RACT) requirements for the 2015 8-hour ozone National Ambient Air Quality Standards (NAAQS) for areas classified as serious. As noted in this submittal, Ohio EPA adopted requirements in Ohio Administrative Code (OAC) rule 3745-110-04 for facilities in the nonattainment areas that emit fifty tons per year or more, but less than one hundred tons per year of nitrogen oxides (NOx) from sources not controlled by the presumptive NOx RACT limits in OAC rule 3745-110-03(A) to OAC rule 3745-110-03(G), the exemptions under OAC rule 3745-110-03(K), or that are subject to the aforementioned presumptive NOx RACT limits but claim that they are technically infeasible or economically unreasonable to achieve to submit an updated RACT study within one year of the effective date of the rule. Upon review of the RACT study, Ohio EPA evaluated if the RACT proposed by the facility is appropriate to satisfy RACT requirements under the 2015 ozone standard.

Ohio is now submitting source-specific NOx RACT for Ford Motor Company - Ohio Assembly Plant (Facility ID 0247030471) for approval into Ohio's SIP. This facility is located in the Cleveland 2015 ozone maintenance area and has no prior existing source-specific RACT established in OAC rule 3745-110-03.

The updated NOx RACT Study was submitted per OAC rule 3745-110-03. Ohio has determined that the updated RACT study, along with supplemental information submitted subsequently, is sufficient to justify the continued use of good combustion practices and proper operation of the burner and associated control systems in accordance with manufacturers specifications and good engineer practices to ensure efficient combustion proposed by the facility to act as RACT for the

enamel #1 ash #1 burner under the 2015 ozone standard. The RACT study is provided in Appendix A, and the permit that incorporated RACT is provided as Appendix B. Within the permit, we have highlighted the terms and conditions associated with RACT and request only those provisions are subject to this SIP revision request. Appendix C provides the permit strategy write-up for the permit.

Ohio held a public comment period on Ohio's RACT determination from September 17 to October 19, 2026. Appendix D contains the public notice. ***[Ohio's response to comments received during the public comment period is in Appendix E/No comments were received during the public comment period].***

This SIP does not include the relaxation of any existing requirements and therefore will not interfere with the attainment or maintenance of the NAAQS in accordance with section 110(l) of the CAA.

Ohio EPA is now requesting approval of the proposed RACT for Ford Motor Company - Ohio Assembly Plant into Ohio's SIP.

Ohio EPA is submitting this SIP via U.S. EPA's State Planning Electronic Collaboration System (SPeCS). If you have questions, please contact Jennifer Van Vlerah in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,

John Logue
Director

Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosures