



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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P.O. Box 1049  
Columbus, OH 43216-1049

**CERTIFIED MAIL**

**RE: DRAFT PERMIT TO INSTALL MODIFICATION**

**WOOD COUNTY**

**Application No: 03-13126**

**Fac ID: 0387040123**

**DATE: 5/8/2008**

Daimler Chrysler Corp - Toledo Machining  
Robert Potter  
8000 Chrysler Drive  
Perrysburg, OH 43551

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR Part 60, Subpart Dc	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

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

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

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

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA NWDO Toledo Metro Area Council of Gov. IN MI

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **03-13126** FOR AN AIR CONTAMINANT SOURCE  
FOR **Daimler Chrysler Corp - Toledo Machining**

On 5/8/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Daimler Chrysler Corp - Toledo Machining**, located at **8000 Chrysler Drive, Perrysburg**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13126:

**Admin. mod to correct emission factors.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**Permit To Install**

**Issue Date: To be entered upon final issuance**

**Terms and Conditions**

**Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 03-13126**

Application Number: 03-13126

Facility ID: 0387040123

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

Name of Facility: Daimler Chrysler Corp - Toledo Machining

Person to Contact: Robert Potter

Address: 8000 Chrysler Drive  
Perrysburg, OH 43551

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

**8000 Chrysler Drive  
Perrysburg, Ohio**

Description of proposed emissions unit(s):

**Admin. mod to correct emission factors.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) 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.)

#### **3. Records Retention Requirements**

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

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions

may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

#### 14. Construction Compliance Certification

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

#### 15. Fees

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

### B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	3.1
PM <sub>10</sub>	3.1
SO <sub>2</sub>	0.3
NO <sub>x</sub>	58.1
CO	34.3
OC	4.5

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

### **A. Applicable Emissions Limitations and/or Control Requirements**

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

#### **Operations, Property, and/or Equipment - (B017) - 95 mmBtu/hour natural gas-fired boiler (with propane as back-up)**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	0.71 lb particulate emissions (PE)/hr, 3.1 tons PE*/yr  0.06 lb sulfur dioxide (SO <sub>2</sub> )/hr, 0.3 tons SO <sub>2</sub> /yr  20.0 lb nitrogen oxides (NO <sub>x</sub> )/hr  7.8 lb carbon monoxide (CO)/hr, 34.3 tons CO/yr  1.02 lb organic compounds (OC)/hr, 4.5 tons OC/yr  See A.2.a.
OAC rule 3745-31-05(C)	58.1 tons NO <sub>x</sub> per rolling, 12-month summation (combined limitation from all natural gas/propane-fired units at the facility) (See A.2.b.)
OAC rule 3745-17-10(B)	See A.2.c.
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-18-06	See A.2.d.
OAC rule 3745-21-08(B)	See A.2.e.
40 CFR Part 60, Subpart Dc	See A.2.f.

\* All PE are considered equivalent to particulate matter 10 microns in diameter or less (PM<sub>10</sub>)

### **2. Additional Terms and Conditions**

- 2.a Best available technology (BAT) control requirements for this emissions unit has been determined to be use of low NO<sub>x</sub> burners. The requirements of this rule also

include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-07(A).

- 2.b** The emissions of NO<sub>x</sub> from emissions units B005, B007, B008, B009, B010, B011, B012, B015, B017, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P043, P044, and the following exempt equipment: door heater #9, door heater #10, water heater Ad. Bldg., water heater Ad. Bldg., water heater N.B. locker room, water heater in Security, preheat oven 9-1/2", washer 9-1/2", brazing furnace 1999 MY, gas generator 1999 MY, brazing furnace 2002 MY, gas generator 2002 MY, preheat oven 45RFE, washer 45RFE, spring retainer oven/quench and piston oven/quench, shall not exceed 58.1 tons/year, based upon a rolling, 12-month summation of the monthly emissions.

The 58.1 tons of NO<sub>x</sub> per year is a federally enforceable limitation established for purposes of limiting potential to emit to avoid Title V applicability.

- 2.c** The limits established under this applicable rule are less stringent than those established under OAC 3745-31-05(A)(3).
- 2.d** This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the terms and conditions in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** There are no applicable limitations established under this rule for emissions units that only combust natural gas/propane.

## **B. Operational Restrictions**

1. The permittee shall burn only natural gas (or LPG) in this emissions unit.
2. The maximum annual NO<sub>x</sub> emissions for all the emissions units identified in section A.2.b above shall not exceed 58.1 tons per year, based upon a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the NO<sub>x</sub> emissions levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable NO<sub>x</sub> Emissions</u>
1	4.84
1-2	9.68
1-3	14.52
1-4	19.36
1-5	24.2
1-6	29.02
1-7	33.88
1-8	38.72
1-9	43.56
1-10	48.4
1-11	53.24
1-12	58.1

The NO<sub>x</sub> emissions for each calendar month shall be calculated in accordance with the equation found in C.1.c. below.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual NO<sub>x</sub> emissions limitation shall be based upon a rolling 12-month summation of the monthly NO<sub>x</sub> emissions.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the following information for emissions units B005, B007, B008, B009, B010, B011, B012, B015, B017, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P043, P044, and the following exempt equipment: door heater #9, door heater #10, water heater Ad. Bldg., water heater Ad. Bldg., water heater N.B. locker room, water heater in Security, preheat oven 9-1/2", washer 9-1/2", brazing furnace 1999 MY, gas generator 1999 MY, brazing furnace 2002 MY, gas generator 2002 MY, preheat oven 45RFE, washer 45RFE, spring retainer oven/quench and piston oven/quench, combined:
  - a. the quantity of natural gas combusted during the month in all of the above-mentioned sources, in million cubic feet (X);

- b. the quantity of propane combusted during the month in all of the above-mentioned sources, in thousand gallons (Y);
- c. the NO<sub>x</sub> emission rate for the month, calculated as follows:

$$[(0.00005 X) + (0.019 Y)] / 2000 = Z$$

where:

Z = the NO<sub>x</sub> emissions for all of the above-mentioned sources, in tons/month; and

- d. beginning the first month after the 12 calendar months of operation, the rolling, 12-month summation of the emission rate for NO<sub>x</sub>, in tons, as follows:

$$Z_T = Z_{M1} + Z_{M2} + Z_{M3} + \dots + Z_{M12}$$

where:

Z<sub>T</sub> = The annual NO<sub>x</sub> emissions (in tons) as summed from the previous 12 months of monthly NO<sub>x</sub> emissions; and

Z<sub>M1</sub> = The monthly NO<sub>x</sub> emissions (tons/month).

- 2. For each day during which the permittee burns a fuel other than natural gas or propane, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

#### **D. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:
  - a. the rolling, 12-month NO<sub>x</sub> emissions; and
  - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative NO<sub>x</sub> emissions limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- 2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or propane was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

**E. Testing Requirements**

1. Compliance with the emission limitations in the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitations:**  
0.71 lbs PE/hr, 3.1 tons PE/yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 7.6 lb PE/10<sup>6</sup> scf derived from AP-42 tables 1.4-1 and 1.4-2 (revised 7/1998) for small boilers (<100 mmBtu/hr) by a maximum natural gas usage rate of 93,137.3 scf/hr.

The annual emission limitation was established by multiplying the emission limitation of 0.71 lb PE/hr by 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, as long as compliance is maintained with the hourly emission limitation, compliance with the annual limitation shall be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. **Emission Limitations:**  
0.06 lbs SO<sub>2</sub>/hr, 0.3 tons SO<sub>2</sub>/yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 0.6 lb SO<sub>2</sub>/10<sup>6</sup> scf derived from AP-42 tables 1.4-1 and 1.4-2 (revised 7/1998) for small boilers (<100 mmBtu/hr) by a maximum natural gas usage rate of 93,137.3 scf/hr.

The annual emission limitation was established by multiplying the emission limitation of 0.06 lbs SO<sub>2</sub>/hr by 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, as long as compliance is maintained with the hourly emission limitation, compliance with the annual limitation shall be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 6 of 40 CFR Part 60, Appendix A.

- c. **Emission Limitation:**  
20.0 lbs NO<sub>x</sub>/hr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 19.0 lb NO<sub>x</sub>/1000 gallons derived from AP-42 Table 1.5-1

(revised 10/1996) for small boilers (<100 mmBtu/hr) by a maximum LPG usage rate of 1050.0 gallons/hr.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 7 of 40 CFR Part 60, Appendix A.

- d. **Emission Limitations:**  
7.8 lbs CO/hr, 34.3 tons CO/yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 84.0 lb CO/10<sup>6</sup> scf derived from AP-42 tables 1.4-1 and 1.4-2 (revised 7/1998) for small boilers (<100 mmBtu/hr) by a maximum natural gas usage rate of 93,137.3 scf/hr.

The annual emission limitation was established by multiplying the emission limitation of 7.8 lbs CO/hr by 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, as long as compliance is maintained with the hourly emission limitation, compliance with the annual limitation shall be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 10 of 40 CFR Part 60, Appendix A.

- e. **Emission Limitations:**  
1.02 lbs OC/hr, 4.5 tons OC/yr

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be determined by multiplying an emission factor of 11.0 lb OC/10<sup>6</sup> scf derived from AP-42 tables 1.4-1 and 1.4-2 (revised 7/1998) for small boilers (<100 mmBtu/hr) by a maximum natural gas usage rate of 93,137.3 scf/hr.

The annual emission limitation was established by multiplying the emission limitation of 1.02 lbs OC/hr by 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, as long as compliance is maintained with the hourly emission limitation, compliance with the annual limitation shall be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4, and 18, 25 or 25A of 40 CFR Part 60, Appendix A.

- f. **Emission Limitation:**  
58.1 tons NO<sub>x</sub>/rolling, 12-month (combined limitation from all natural gas/propane-fired units at the facility)

**Applicable Compliance Method:**

Compliance with the annual NO<sub>x</sub> emission limitation above shall be demonstrated by the record keeping requirements in section C.1 of this permit.

g. **Emission Limitation:**

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

**Applicable Compliance Method:**

If required, the permittee shall demonstrate compliance in accordance with Method 9 of 40 CFR Part 60, Appendix A.

**F. Miscellaneous Requirements**

None