



11/8/2013

Certified Mail

Mr. Ryan Coleman
HONDA OF AMERICA, EAST LIBERTY PLANT
11000 State Route 347
East Liberty, OH 43319

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0546000117
Permit Number: P0113358
Permit Type: Administrative Modification
County: Logan

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	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 (EPA) Weekly Review and the local newspaper, Bellefontaine Examiner. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. 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:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. 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, Southwest District Office at (937)285-6357.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-SWDO; Indiana

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
HONDA OF AMERICA, EAST LIBERTY PLANT

Issue Date: 11/8/2013

Permit Number: P0113358

Permit Type: Administrative Modification

Permit Description: Plantwide Applicability Limit (PAL) permit per OAC rule 3745-31-32.

Facility ID: 0546000117

Facility Location: HONDA OF AMERICA, EAST LIBERTY PLANT

11000 St. Rt. 347,

East Liberty, OH 43319-9407

Facility Description: Automobile Manufacturing, Light Truck and Utility Vehicle Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
HONDA OF AMERICA, EAST LIBERTY PLANT

Facility ID:	0546000117
Permit Number:	P0113358
Permit Type:	Administrative Modification
Issued:	11/8/2013
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
HONDA OF AMERICA, EAST LIBERTY PLANT

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Draft Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0113358
Facility ID: 0546000117
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0046891, A0049183
Permit Number: P0113358
Permit Description: Plantwide Applicability Limit (PAL) permit per OAC rule 3745-31-32.
Permit Type: Administrative Modification
Permit Fee: \$4,300.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/8/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347
East Liberty, OH 43319-9407

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0113358

Permit Description: Plantwide Applicability Limit (PAL) permit per OAC rule 3745-31-32.

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:	Hot Water Boiler No. 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B005
Company Equipment ID:	Hot Water Boiler No. 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B006
Company Equipment ID:	Hot Water Boiler No. 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B007
Company Equipment ID:	Air Handler No. 25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B035
Company Equipment ID:	Generator #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B046
Company Equipment ID:	VQD Dyno Building ASU
Superseded Permit Number:	P0107966
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B409
Company Equipment ID:	Generator #3
Superseded Permit Number:	05-13448
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F096
Company Equipment ID:	Roadways and Parking Areas
Superseded Permit Number:	05-08339
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K001
Company Equipment ID:	EDP Coating Line
Superseded Permit Number:	P0105436
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Sealer/Deadener Coating Line
Superseded Permit Number:	P0115328
General Permit Category and Type:	Not Applicable



Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K003 Guidecoat Line P0111466 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K005 Topcoat Coating Line A P0115070 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K006 Topcoat Coating Line B P0115070 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K007 Primary Topcoat On-Line Repair 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K008 Secondary Topcoat On-Line Repair 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K009 Wax/Polish Coating Line 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K011 Final Repair 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K012 Specialty Topcoat Coating and On-Line Repair 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K013 Assembly Miscellaneous Coating Line 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K015 Plastic Coating Line 05-10278 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K018 WE Rust Prevention Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	K024 Spray Melt Sheet Operation P0105011 Not Applicable



Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P001 Pretreatment/Phosphate Process 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P002 Body Line Paint Effluent System 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P003 EDP Sanding 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P004 Surfacer Sanding 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P006 Process Welding and Related Operations 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P014 On-Line Repair Sanding 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P016 All-Body Repair Sanding 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P017 Inspection Sanding 05-07923 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P018 WE Sealer Wipe 05-06431 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P020 BPA Polish 05-10278 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P021 Plastic Parts Painting Miscellaneous Solvent Usage 05-10278 Not Applicable
Emissions Unit ID: Company Equipment ID: Superseded Permit Number: General Permit Category and Type:	P023 Stamping Transfer Press Not Applicable



Draft Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0113358
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Emissions Unit ID:	P025
Company Equipment ID:	Injection Mold Machine #1
Superseded Permit Number:	05-14163
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	Injection Mold Machine #2
Superseded Permit Number:	05-14163
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Injection Mold Machine #3
Superseded Permit Number:	05-14163
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P045
Company Equipment ID:	Plastic Parts Coating Line Effluent System
Superseded Permit Number:	P0114841
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Injected Parts Coating Line
Superseded Permit Number:	P0106341
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0113358
Facility ID: 0546000117
Effective Date: To be entered upon final issuance

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) and A. 6.d), 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, Southwest 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, Southwest 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, Southwest 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 semi-annual 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, Southwest 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, Southwest 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, Southwest 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, Southwest 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 by up to 12 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 shutdown 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 other any 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 (12) 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.



Draft Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0113358
Facility ID: 0546000117
Effective Date: To be entered upon final issuance

A. 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) Section B.8.a)-g), below.
2. Establishment of Plant-wide Applicability Limitations (PALs)
 - a) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) volatile organic compound (VOC) emission limitation of 2,121.2 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,060 and 2,102 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,081 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,121.2 tons per year on a rolling, 12-month basis.
 - b) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) carbon monoxide (CO) emission limitation of 236 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide CO emissions from 2004 and 2005 of 139 and 134 tons, respectively. Average facility-wide CO emissions for 2004 and 2005 are 136 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 99.9 tons of CO, the adjusted baseline actual facility-wide CO emissions are 236 tons per year on a rolling, 12-month basis.
 - c) The combined facility-wide, ((Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) nitrogen oxides (NOx) emission limitation of 202.5 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide NOx emissions from 2004 and 2005 of 164.7 and 160.4 tons, respectively. Average facility-wide NOx emissions for 2004 and 2005 are 162.6 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of NOx, the adjusted baseline actual facility-wide NOx emissions are 202.5 tons per year on a rolling, 12-month basis.
 - d) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) particulate material (PM) emission limitation of 133.3 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM emissions from 2004 and 2005 of 107.1 and 108.7 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 107.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of PM, the adjusted baseline actual facility-wide PM emissions are 132.8 tons per year on a rolling, 12-month basis.
 - e) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM₁₀ emission limitation of 93.9 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM₁₀ emissions from 2004 and 2005 of 77.9 and 79.1 tons,



respectively. Average facility-wide PM₁₀ emissions for 2004 and 2005 are 78.5 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM₁₀, the adjusted baseline actual facility-wide PM₁₀ emissions are 93.4 tons per year on a rolling, 12-month basis.

- f) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{2.5} emission limitation of 64.6 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide PM_{2.5} emissions from 2004 and 2005 of 54.0 and 54.4 tons, respectively. Average facility-wide PM_{2.5} emissions for 2004 and 2005 are 54.2 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 9.9 tons of PM_{2.5}, the adjusted baseline actual facility-wide PM_{2.5} emissions are 64.1 tons per year on a rolling, 12-month basis.
- g) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) sulfur oxides (SOx) emission limitation of 42.8 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide SOx emissions from 2004 and 2005 of 2.8 and 2.9 tons, respectively. Average facility-wide SOx emissions for 2004 and 2005 are 2.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.9 tons of SOx, the adjusted baseline actual facility-wide SOx emissions are 42.8 tons per year on a rolling, 12-month basis.
- h) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) greenhouse gas (GHG) emission limitation of 263,440 tons per year on a rolling, 12-month basis was established in accordance with OAC rule 3745-31-32(A)(5) and is based upon actual facility-wide GHG emissions from 2005 and 2006 of 190,513 and 186,352 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 188,441 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 74,999 tons of GHG, the adjusted baseline actual facility-wide GHG emissions are 264,581 tons per year on a rolling, 12-month basis.

3. Plant-wide Applicability Limitations (PALs)

a) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) VOC emissions shall not exceed 2,121.2 tons per year rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing VOC emissions on a rolling, 12-month basis from all emissions units that emit VOCs at the facility, (Premise numbers 180010193, 180010197, 180010199, 180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential.VOC emissions



from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

b) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) CO emissions shall not exceed 236 tons per year rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all emissions units that emit COs at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. . For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. CO emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

c) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) NOx emissions shall not exceed 202.5 tons per year rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing NOx emissions on a rolling, 12-month basis from all emissions units that emit NOx s at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. NOx emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

d) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM emissions shall not exceed 132.8 tons per year rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM emissions on a rolling, 12-month basis from all emissions units that emit PMs at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de



minimis, exempt, and combustion sources. . For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

e) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM₁₀ emissions shall not exceed 93.4 tons per year rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM₁₀ emissions on a rolling, 12-month basis from all emissions units that emit PM₁₀ s at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. . For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM₁₀ emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

f) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{2.5} emissions shall not exceed 64.1 tons per year 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 emissions units that emit PM_{2.5} s at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. . For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. PM_{2.5} emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

g) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) SO_x emissions shall not exceed 42.8 tons per year rolling 12-month basis.



Applicable Compliance Method:

Compliance shall be demonstrated by summing SO_x emissions on a rolling, 12-month basis from all emissions units that emit SO_x s at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. . For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. SO_x emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

h) Emission Limitation:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) GHG emissions shall not exceed 264,581 tons per year rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all emissions units that emit GHG s at the facility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) including but not limited to de minimis, exempt, and combustion sources. . For each insignificant emissions source, the permittee shall maintain monthly records of the total monthly emissions and the total cumulative emissions from the previous 12-month period. The records shall include the emissions calculations based on either monthly usage records or worst-case potential. GHG emissions from non-insignificant emissions units shall be determined in accordance with the Monitoring and/or Recordkeeping and Testing Sections of this permit for each emissions unit.

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 12-month rolling 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 emissions units at the combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) for VOC, PM_{2.5}, PM₁₀, NO_x, CO, SO₂, and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS, and/or emission factors).



- d) Natural gas usage for process and building heat shall be monitored using the billing meters associated with the facility (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133). By using the billing meters, the permittee will have collected natural gas usage for significant and insignificant emission units located at the facility. Monthly VOC, PM_{2.5}, PM₁₀, PM, NO_x, CO, SO₂, and GHG emissions shall be calculated from the monthly usage records and the applicable AP-42 emission factors. These emissions shall be included in the compliance demonstrations for each applicable Plantwide Applicability Limit specified in section B.3 of this permit. The permittee shall have the option to subtract natural gas usage associated with mobile sources from the billing records provided adequate records are maintained to substantiate the deduction.

5. PAL Reporting Requirements

- a) The permittee shall submit semi-annual monitoring reports and prompt deviation reports to the Ohio EPA Central District Office and/or Southwest District Office based on the appropriate office and premise number of the emissions units' locations in accordance with the appropriate and applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:

(1) Semi-annual report:

The semi-annual report shall be submitted to the appropriate 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 (tons per year) based on a twelve-month rolling total for each month in the reporting period recorded pursuant to B.4.a)(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 emissions units modified or added to the major stationary source during the preceding six-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 emissions unit 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 appropriate Ohio EPA 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, SO₂, GHG, PM₁₀, and PM_{2.5} emissions in accordance with the Monitoring and Record Keeping Requirements for each emissions unit for the purpose of summing plant-wide VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions and determining the rolling, 12-month VOC, NO_x, CO, SO₂, GHG, PM₁₀, and PM_{2.5} emissions.



7. PAL Permit Requirements

- a) The PAL in section B 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 appropriate 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 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 emissions units and modification of existing emissions units that do not require an increase in emissions limitations provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.
 - (3) A demonstration that the new or modified emissions unit meets these criteria shall be kept on site for the life of the new or modified emissions unit and made available to the Ohio EPA upon request. The permittee must notify the appropriate Ohio EPA District office of the installation of the new emissions unit or modification of an existing emissions unit 30 days before the installation or modification of the emissions unit.

8. The provisions of OAC rule 3745-114 address Ohio's "Toxic Air Contaminant Statute" 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 maximum achievable control technology (MACT) standard or residual risk standard under section 112 of the Federal Clean Air Act pursuant to the Ohio Revised Code (ORC) 3704.03(F)(4)(e).

The following emissions units at premise number 0546000117 are subject to 40 CFR Part 63, Subpart IIII, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:

- K001 (EDP Coating Line);
- K002 (Sealer/Deadner Coating Line);
- K003 (Guidecoat Line);
- K005 (Topcoat Line A);
- K006 (Topcoat Line B);
- K007 (Primary Topcoat On-Line Repair);
- K008 (Secondary Topcoat On-line Repair);
- K009 (Wax/Polish Coating Line);
- K012 (Specialty Topcoat Coating and On-Line Repair); and
- K013 (Assembly Miscellaneous Coating Line).

The following emissions unit at premise number 0546000117 is subject to 40 CFR Part 63, Subpart ZZZZ, for organic HAPs and is, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:



B035 (1135 HP emergency generator); and
B409 (1232 HP generator).

The following emissions units at premise number 0546000117 are subject to 40 CFR Part 63, Subpart PPPP, for organic HAPs and are, therefore, not subject to the requirements of Ohio's "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs:

K015 (Plastic Coating Line);
P021 (Plastic Parts Miscellaneous Solvent Usage); and
R005 (Injected Parts Coating Line).

In addition, if the toxic air contaminant is an organic Hazardous Air Pollutant (HAP) subject to the MACT standard identified above (40 CFR Part 63, Subpart IIII; 40 CFR Part 63, Subpart ZZZZ; or 40 CFR Part 63, Subpart PPPP) and emitted by any air contaminant source not identified above, modeling in accordance with Ohio's "Toxic Air Contaminant Statute" 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 "Toxic Air Contaminant Statute" or the conditions that follow for organic HAPs.

For air contaminant sources not subject to a MACT standard, new installations or physical changes to or changes in the method of operation of any of the emissions units at the facility could affect the parameters used to determine whether or not the "Toxic Air Contaminant Statute" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Toxic Air Contaminant Statute" will be satisfied. If, upon evaluation, the permittee determines that the "Toxic Air Contaminant Statute" 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 "Toxic Air Contaminant Statute" include the following:

- a) New installation of an emissions unit that emits a toxic air contaminant identified under OAC rule 3745-114-01;
- b) 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 Threshold Limit Value (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;
- c) 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
- d) Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the new installation and/or changed emissions unit will still satisfy the "Toxic Air Contaminant Statute":

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



- b) Documentation of its evaluation and determination that the new installation and/or changed emissions unit satisfies the “Toxic Air Contaminant Statute”; and
- c) Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Toxic Air Contaminant Statute” for the change.

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

New installations and physical changes to or changes in the method of operation of any emissions units at the facility that satisfy the “Toxic Air Contaminant Statute” 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 “Toxic Air Contaminant Statute” subject to approval by the Ohio EPA. This could include initial modeling under “worst case scenario” and evaluating whether or not each change would fall within that scenario and satisfy the “Toxic Air Contaminant Statute”.

9. Revisions to Best Available Technology (BAT) Limits During a Modification under the PAL

a) Background

Under OAC rule 3745-31-05, all new or modified air contaminant sources, with the exception of sources subject to exemptions and permits-by-rule as defined in OAC rule 3745-31-03, must employ Best Available Technology (BAT) as defined in OAC rule 3745-31-01. BAT requirements have been defined for each air contaminant source contained in this permit.

Under ORC 3704.03(F)(2), no installation permit is required to be obtained for activities that occur under the Plant-wide Applicability Limit (PAL) permit if the activities are subject to and in compliance with any applicable PAL and subject to and in compliance with any applicable PAL rules contained in OAC Chapter 3745-31.

Under these provisions, a permit-to-install or permit-to-install and operate is not required to be obtained when an emissions unit covered by the PAL is installed or modified. However, PAL permit emissions units that are installed or modified during the life of the PAL permit must continue to (for an existing source) or begin to (for a new source) employ BAT where applicable.

b) New or Modified Emissions Unit BAT Requirements

Prior to installation or modification of an emissions unit covered under the PAL permit, the owner or operator shall evaluate applicability, and, if applicable, determine BAT. This evaluation and determination shall follow applicable Ohio EPA air quality rules, guidelines, and policies associated with BAT determinations. The determination of BAT shall include the following steps, as appropriate:

- (1) Determination of the size and type of emissions unit that will be considered a “substantially similar source” for the BAT determination purposes.
- (2) Researching emissions limits or work practices for known similar sources. At a minimum, the research should include reviewing the Ohio EPA BAT database, U.S. EPA’s BACT/RACT/LAER database, reviewing applicable state regulation limits (excluding severe non-attainment area regulations), and permits from other similar



sources. Only "substantially similar sources" that have been demonstrated to operate satisfactorily in Ohio or other states with similar air quality should be included in this research.

- (3) Completing a cost-effectiveness analysis following Ohio EPA, Division of Air Pollution Control Engineering Guide #46 for any pollutant where the uncontrolled potential-to-emit is greater than 70 tons per year. The uncontrolled potential-to-emit should take into account any federally enforceable limitations or physical limitations on the potential-to-emit.
 - (4) A determination of emission rate units to be used for the BAT determination. The units should be consistent with the units utilized in similar Ohio EPA issued emissions unit permits.
 - (5) A determination of the monitoring, record keeping, and reporting requirements for the BAT determination. The monitoring, record keeping, and reporting requirements shall be consistent with the monitoring, record keeping, and reporting requirements already established as part of the PAL permit.
 - (6) A determination of the compliance method to be used for the BAT determination. The compliance method shall be consistent with the compliance method utilized in the PAL permit for similar emissions units or in similar emissions unit permits issued by Ohio EPA.
 - (7) An evaluation of the above information and a determination concerning the selected BAT.
- c) The results of the BAT determination shall include, at a minimum, the following:
- (1) a description of the type of emissions unit evaluated;
 - (2) the numerical BAT value selected;
 - (3) the emission rate unit selected;
 - (4) a description of any associated control equipment selected as BAT;
 - (5) a description of any federally enforceable restrictions requested to be used; and
 - (6) a description of any work practices, raw material specifications, throughput limitations, and source design characteristics to be used.
- The owner or operator may consult with Ohio EPA for assistance in determining an acceptable BAT determination.
- d) Once the new or modified source is installed and operating, the owner or operator shall comply with the BAT determination selected utilizing the compliance determination selected. In addition, the owner or operator shall follow any monitoring, record keeping, and reporting selected to support the BAT determination.



- e) The BAT determination selected by the owner or operator, and its associated monitoring, record keeping, reporting, and compliance determination methods shall be effective until the director issues a revised permit containing a reevaluation and redetermination of BAT.
- f) Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.7.b) through B.7.e), and the following paragraph, shall be considered void and no longer required for changes made in compliance with the requirements of the PAL permit.

10. New or Modified Emissions Unit BAT Reporting

Under OAC paragraph 3745-31-32(A)(13)(a)(iv), the owner or operator of the PAL permit shall submit a list of any emissions units modified or added to the major stationary source during the preceding six-month reporting period. In addition to the information required to be submitted under OAC paragraph 3745-31-32(A)(13)(a) for the required semi-annual report, the owner or operator of the PAL permit shall include a report describing the work that was done to determine BAT for a new or modified source. This report shall include, at a minimum, the background information collected for the BAT determination and the information described in B.7.

11. The terms and conditions contained in this permit shall supersede the terms and conditions for premise 0546000117 in Permit to Install (PTI) 05-448 issued 11/30/2004, for emissions units B409; PTI 05-08339 issued 12/16/2003, for emissions units F096; PTI P0105436 issued 03/29/2010, for emissions units K001; PTI P0115328 issued 9/13/13, for emissions units K002; PTI P0111466 issued 12/5/12, for emissions units K003; PTI P0115070 issued 9/10/13, for emissions units K005 and K006; PTI 05-07923 issued 01/08/2008, for emissions units K007, K008, K009, K011, K012, K013, and P004; PTI 05-10278 issued 12/18/2007, for emissions units K015 and P021; PTI P0105011 issued 09/04/2009, for emissions units K024; PTI 05-14163 issued 11/17/2005, for emissions units P025, P026, and P027; and PTI P0106341 issued 11/22/2010, for emissions units R005

12. The permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light Duty Trucks (40 CFR Part 63, Subpart IIII) as an existing major source with a compliance date as specified in the final standard. The following emissions units contained in this permit are subject to 40 CFR 63, Subpart IIII: K001, K002, K003, K005, K006, K007, K008, K009, K012, and K013. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA, Southwest District Office (SWDO).

13. The permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) as an existing major source with a compliance date specified in the final standard. The following emission units contained in this permit are subject to 40 CFR 63, Subpart PPPP: K015, P021, and R005. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA, Southwest District Office (SWDO).

Because these emission units are co-located at an affected source subject to 40 CFR 63 Subpart IIII, the permittee has the option under 40 CFR 63.3082(c) for these units to be subject to 40 CFR Part 63, Subpart IIII. If the permittee decides to include one or more these emission units in the existing



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affected source subject to 40 CFR Part 63, Subpart IIII, the requirements of 40 CFR Part 63, Subpart PPPP will no longer apply to those emission units. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Southwest District Office (SWDO).

14. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions units B035, B045, and B409 are considered "existing limited use stationary reciprocating internal combustion engines" and therefore are not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A. They are considered "limited use" because they are operated less than 100 hours per year. If the permittee elects to operate B035 and/or B409 as a new affected source other than a limited use RICE then all of the requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply to the emissions unit(s).



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C. Emissions Unit Terms and Conditions



1. B035, Generator #2

Operations, Property and/or Equipment Description:

1135 hp, Emergency generator

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 operations(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. 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)	Emissions shall not exceed : Nitrogen oxide (NOx) emissions of 24.0 pounds per hour; Carbon monoxide (CO) emissions of 6.4 pounds per hour; Volatile organic compound (VOC) emissions of 0.6 pound per hour; Particulate emissions (PE) of 2.7 pound per hour; and/or Sulfur dioxide (SO2) emissions of 3.8 pounds per hour.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. See Section f)(1)b., below.
d.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb./MMBtu of actual heat input. See Section f), below.
e.	OAC rule 3745-18-06	This unit is exempt per OAC rule 3745-18-06(B). See Section b)(2)c., below.

(2) Additional Terms and Conditions

- a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.
- b. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.; and
 - ii. Section f)(1)a.
- c. OAC rule 3745-18-06(B) exempts fuel burning equipment which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity from the requirements are exempt from paragraphs (D), (F) and (G) of this rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

c) Operational Restrictions

- (1) The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.



d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/MMBtu). The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (for example, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

- (2) For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed; and
 - b. all instances in which fuel other than diesel (number two fuel oil) was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
 - i. NO_x - 24.0 lbs/hr;
 - ii. CO - 6.4 lbs/hr;
 - iii. VOC - 0.6 lb/hr;
 - iv. PE - 2.7 lbs/hr; and
 - v. SO₂ - 3.8 lbs/hr.



Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 7.49 MMBTU/hr by the emission factor* for each pollutant, from AP-42, Table 3.4-1.

* for NO_x, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO₂, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU. If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO₂, Methods 1 - 4 and 6.

b. Visible Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.062 lb. PE/MMBtu

Applicable Compliance Limit:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

(1) None.



2. B409, Generator #3

Operations, Property and/or Equipment Description:

1232 HP generator

- 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 operations(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. 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)	Emissions shall not exceed: Nitrogen oxide (NOx) emissions of 28.5 pounds per hour; Carbon monoxide (CO) emissions of 7.64 pounds per hour; Volatile organic compound (VOC) emissions of 0.7 pound per hour; Particulate emissions (PE) of 3.2 pound per hour; and Sulfur dioxide (SO2) emissions of exceed 4.5 pounds per hour.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. See Section f)(1), below.
d.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input. See Section f)(1), below.
e.	OAC rule 3745-18-06	This unit is exempt per OAC rule 3745-18-06(B). See Section b)(2)c., below.

(2) Additional Terms and Conditions

- a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.
- b. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.; and
 - ii. Section f)(1)a.
- c. OAC rule 3745-18-06(B) exempts fuel burning equipment which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity from the requirements are exempt from paragraphs (D), (F) and (G) of this rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

c) Operational Restrictions

- (1) The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.



d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/MMBtu). The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (for example, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

- (2) For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed; and
 - b. all instances in which fuel other than diesel (number two fuel oil) was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
 - i. NO_x - 28.5 lbs/hr;
 - ii. CO - 7.64 lbs/hr;
 - iii. VOC - 0.7 lb/hr;
 - iv. PE - 3.2 lbs/hr; and
 - v. SO₂ - 4.5 lbs/hr.



Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 8.91 MMBTU/hr by the emission factor* for each pollutant, from AP-42, Table 3.4-1.

* for NO_x, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO₂, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO₂, Methods 1 - 4 and 6.

b. Visible Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.062 lb. PE/MMBtu

Applicable Compliance Limit:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

(1) None.



3. F096, Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas at East Liberty (ELP)

- 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 operations(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. 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)	<p>There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.</p> <p>There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.</p> <p>Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.</p>
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide PM, PM10, and PM2.5 emissions applies to this emissions unit. The PAL for PM, PM10, and PM2.5 is listed in the facility-wide terms and conditions in B.1. The record



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		keeping requirements in section d) contribute to the calculation of the total PM, PM10, and PM2.5 emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B)	See Section b)(2), below.

(2) Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
 - i. ID 1 - Truck entrance;
 - ii. ID 2 - South truck dock area;
 - iii. ID 3 - Container storage yard;
 - iv. ID 4 - Associate entrance drive;
 - v. ID 5 - Associate parking;
 - vi. ID 6 - Test track;
 - vii. ID 7 - Brake test area;
 - viii. ID 8 - North truck dock area;
 - ix. ID 9 - Access road to east side;
 - x. ID 10 - Access road to north side;
 - xi. ID 11 - AQG building FTZ parking;
 - xii. ID 12 - AQG associate parking lot;
 - xiii. ID 13 - Gas plaza;
 - xiv. ID 14 - AH car storage;
 - xv. ID 15 - AH entry drive;
 - xvi. ID 16 - AH truck staging; and
 - xvii. ID 17 - AH railcar staging.



- b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
 - i. ID U1 - Rapp-Dean Road (behind ELP); and
 - ii. ID U2 - Access to sub-station.
- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ vacuum assisted sweeping for the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved shoulders as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved roadway and parking area as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.



- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
 - i. The permittee shall require operators of open-bodied vehicles transporting materials likely to become airborne to keep such materials covered if the control measure is necessary for the materials being transported.
 - j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
 - k. This emissions unit is not located in an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, the emissions unit is not subject to the RACM requirements established in OAC rule 3745-17-08(B) and the visible emission limitations specified in OAC rule 3745-17-07(B).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise specified in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
 - a. for all paved roadways and parking areas, as identified in b)(2), the minimum inspection frequency shall be weekly; and
 - b. for all unpaved roadways and parking areas, as identified in b)(2), the minimum inspection frequency shall be weekly.
- After the permittee has performed weekly inspections of the paved and the unpaved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved and the unpaved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions.
- (2) The purpose of the inspections is to determine the need for implementing the additional control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be



performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

- (3) The permittee may, upon receipt of written approval from OEPA, SWDO modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
 - (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures. The information required in (3)d. shall be kept separately for:
 - i. the paved roadways and parking areas; and
 - ii. the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
 - (5) Reconfiguration of the roadways and parkways areas and variations in traffic patterns at this facility may not be a modification under OAC rule 3745-31-01 as long as emissions are equal to or less than the established PTI limitations. If the change is determined to be a modification then the permittee must apply for and obtain a permit to install prior to the installation of the change.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each instance when an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.

There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance shall be determined based on the records under Section d)(1) of this permit.

If required, compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.



4. K001, EDP Coating Line

Operations, Property and/or Equipment Description:

EDP coating line

- 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 operations(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. 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)	Volatile organic compound (VOC) emissions shall not exceed 1.12 lbs/gallon of coating, as applied excluding water and exempt solvents (free solvent). Emissions from natural gas combustion in the drying oven and the incinerator: 0.05 lb PM10/hr; 0.06 lb SO2/hr; 1.00 lb NOx/hr; 0.81 lb CO/hr; and 0.05 lb VOC/hr.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(C)(1)(a)	See Section b)(2)h., below.
d.	OAC rule 3745-18-06(E)	See section b)(2), below.
e.	OAC rule 3745-17-11(B) (for the direct-fired ovens associated with this emissions unit)	See Section b)(2), below.
f.	OAC rule 3745-17-07(A) (for direct-fired ovens associated with this emissions unit)	See Section b)(2), below.
g.	OAC rule 3745-17-10(B) (for the indirect-fired ovens associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
h.	OAC rule 3745-17-07(A) (for indirect-fired ovens associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
i.	40 CFR 60, Subpart MM	The pounds of VOC per gallon (kg/liter) of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-21-09(C).
j.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. This emissions unit includes a series of open, uncontrolled tanks (baths) consisting of a mix of water, solvent, resin and paste. Vehicle body frames are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal incinerator. The uncontrolled emissions



from the tanks and transfer area released prior to entering the oven are referred to as “free solvent” emissions for the purposes of this permit. The controlled emissions from the oven curing process are referred to as “cure volatiles” for the purposes of this permit.

- b. This emissions unit shall not exceed the following:
 - i. When the solids turnover ratio (R_T)* is 0.160 or greater:
 - (a) VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average. - ii. When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:
 - (a) VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average. - iii. When the solids turnover ratio (R_T)* is less than 0.040:
 - (a) No free solvent or total VOC emission limitation is applicable.
- * R_T is calculated in accordance with OAC rule 3475-21-09(C)(1)(a)(ii).
- c. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.
 - d. The emission limitation specified under OAC rule 3745-31-05(A)(3) is based on an assumed oven capture efficiency of 95%, by weight, as estimated in the permit to install application and shall be used for emissions calculations until testing is conducted. The capture efficiency may be adjusted based on the results of testing required in f)(2) below.
 - e. The emission limitations for PM₁₀, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.



f. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

g. The PE from direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

h. This emissions unit shall not exceed the following:

i. 1.4 pounds of VOC per gallon of solids from the electrodeposition coating line; or

ii. 1.4 pounds of VOC per gallon of solids from any electrodeposition (EDP) coating line when the solids turnover ratio (RT) is 0.16 or greater. RT shall be calculated as follows:

$$RT = Te/Le$$

where:

Te = total volume of coating solids that is added to the EDP coating line in a calendar month (gallons).

Le = volume design capacity of the EDP system, which is the total liquid volume contained in the EDP system's tanks, pumps, recirculating lines, filters, etc. at the system's designed liquid operating level (gallons); or

iii. $1.4 \times 350(0.160-RT)$ pounds of VOC per gallon of solids from any EDP coating line when RT, calculated according to the above equation, is greater than or equal to 0.040 and less than 0.160; or

iv. (iv) When RT, calculated according to the above equation is less than 0.040 for any EDP coating line, there is no emission limit.

i. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.



- j. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a., b., c. d. and e;
 - iii. Section c)(2);
 - iv. Section d)(2) and (3);
 - v. Section e)(1) a. and b.;
 - vi. Section e)(2); and
 - vii. Section f)(1)b. and d.
- c) **Operational Restrictions**
 - (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the e-coat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.
 - (2) The permittee shall burn only natural gas in this emissions unit.
 - (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
 - (4) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature of the thermal incinerator when the e-coat oven is processing units (vehicles). 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 and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall maintain the following monthly records on all materials employed in this emissions unit:
 - a. the name and identification of each coating and solvent employed;
 - b. the VOC content of each coating (free solvent) and solvent employed, in pounds per gallon;
 - c. the number of gallons of each coating and solvent employed, in gallons;



- d. the total VOC emissions from all coatings and solvent employed, (excluding cleanup and purge materials maintained in d)(4) in pounds per month, i.e., the summation of the materials employed (“b” x “c”);
- e. the volume solids content of each coating added to the system;
- f. the amount of solids, in gallons (“c” x “e” x transfer efficiency);
- g. the monthly volume-weighted average VOC content of the coatings (free solvent), as applied (“d” / “f”);
- h. the VOC content of the cure volatiles of each coating employed**, in pounds per gallon;
- i. the total uncontrolled cure volatile VOC emissions, in pounds per month (“h” x “c”);
- j. the total VOC emissions (free solvent + controlled cure volatiles), in pounds or tons per month, using the most recent test results (“d” + “i” x [1 – oven capture efficiency x thermal incinerator destruction efficiency]);
- k. the total monthly volume-weighted average VOC emissions (free solvent + cure volatiles), in pounds per gallon of applied solids (“j” / “f”);
- l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (ie, the total liquid volume contained in the e-coat system’s tanks, pumps, recirculating lines, filters, etc. at the system’s designed liquid operating level), in gallons; and
- m. the calculated VOC emission limitation according to the calculation in b)(2)b.ii above if the turnover ratio is greater than or equal to 0.040 and less than 0.160.

**The permittee shall maintain records for the e-coat process that will enable the permittee to calculate the cure volatile VOC emissions, in pounds per gallon, from the coatings (paste and resin e-coat blend). The cure volatiles for the coatings shall be calculated by subtracting the free solvent VOC content, as determined by formulation data or U.S. EPA Method 24, from the total VOC content, as determined by a Modified Method 24 adjusted for a higher curing oven temperature.

$$\text{Cure Volatiles} = \text{Total VOC} - \text{Free Solvent.}$$

- (2) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (see b)(1) above):
 - a. the date the recovery tank was emptied;
 - b. the date the materials from the recovery tank were shipped off site;



- c. the number of gallons of materials from the recovery tank shipped off site;
 - d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and
 - e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units at this facility and from the cleanup and purge materials applied in the emissions units listed in sections d)(4) and (5), above.
- (3) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. 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 incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and
 - b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment
- The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.
- (5) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
- a. the VOC emissions rate, in pounds of "free" solvent VOC emitted per gallon of applied solids, is greater than the allowable emission rate as determined by section b)(2). and recorded by section d)(2) of this permit;



- b. the VOC emissions rate, in pounds of “total” (“free” plus “cured”) VOC emitted per gallon of applied solids, is greater than the allowable emission rate as determined by section b)(2). and recorded by section d)(2) of this permit;
- c. the VOC emissions rate, in pounds of VOC emitted per gallon of applied solids, is greater than the allowable emission rate as limited by OAC rule 3745-21-09(C) and recorded by section d)(2) of this permit;
- d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
- e. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Standard Terms and Conditions of this permit;

- (2) The permittee shall notify the Ohio EPA, Southwest District Office in writing of any monthly record showing the use of non-complying coatings, exceeding 1.12 lbs VOC/gal coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office within 30 days
 - (3) The permittee shall submit deviation (excursion) reports to Ohio EPA, Southwest District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in section b)(1). of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations:

When the solids turnover ratio (R_T)* is 0.160 or greater:

VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.

When the solids turnover ratio (R_T)* is greater than or equal to 0.040 and less than 0.160:

VOC emissions from the free solvent shall not exceed $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average and the total VOC emissions (free solvent +



cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - RT)}$ lb/gas, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance with these emission limitations shall be determined through the monthly record keeping requirements established in this permit.

b. Emission Limitation:

1.12 lbs VOC/gallon of coating, as applied, excluding water and exempt solvents (free solvent)

Applicable Compliance Method:

Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping established in this permit.

Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

c. Visible Emission Limitation:

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

d. Emission Limitations:

0.05 lb PM10/hr;

0.06 lb SO2/hr;

1.00 lb NOx/hr;

0.81 lb CO/hr; and

0.05 lb VOC/hr.



Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (9,636 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft. If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix .

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.*** All PM is assumed to be PM10

e. Emission Limitation:

1.40 lbs VOC/gallon of applied solids

Applicable Compliance Method:

Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping established in this permit.

Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified OAC rule 3745-21-09(C).

f. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

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

- a. Emission testing shall be conducted to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). Emission testing shall be conducted at least once every five years after issuance of the permit.



- b. Emission testing shall be conducted to determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit. Emission testing shall be conducted at least once every five years after issuance of the permit.
- c. The following test methods shall be employed to demonstrate compliance:
 - i. Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions); and
 - ii. The capture efficiency of the e-coat oven controlling cure volatiles 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 U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Southwest District Office. The Ohio EPA, Southwest District Office 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.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

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, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Southwest District Office's refusal to accept the results of the emission test(s).

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

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



(3) Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Part 63.3091.

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176).

(4) Formulation data or USEPA Method 24 shall be used to determine the “free” volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit.

(5) A modified USEPA Method 24 shall be used to determine the “cure” volatile organic compound content of materials added to this emissions unit. The modified USEPA Method 24 shall be performed at process temperatures to appropriately identify “cure” volatile emissions generated in the curing process for the emissions unit.

g) Miscellaneous Requirements

(1) None.



5. K002, Sealer/Deadener Coating Line

Operations, Property and/or Equipment Description:

Sealer/deadner coating line with thermal incinerator controls.

- 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 operations(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. 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)	Volatile organic compound (VOC) emissions shall not exceed 14.1 lbs per hour. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator : 0.06 lb PE(filterable)/hr; 0.02 lb SO ₂ /hr; 3.3 lbs NO _x /hr; 2.8 lbs CO/hr; and 0.2 lb VOC/hr
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements)	See Sections b)(2)a. and b, c)(2), d)(4), (6), (7), (8) e)(1), f)(1)b., and c., below.
c.	OAC rule 3745-21-09(U)(1)(i)	The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.
d.	OAC rule 3745-18-06(E)	The SO ₂ emission limitation specified by this rule is less stringent than the SO ₂ emission limitation established pursuant



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		to OAC rule 3745-31-05(A)(3) (for the fuel burning equipment associated with this emissions unit).
e.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2)e, below.
f.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2)f, below.
g.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-11(C)	See Section b)(2)g, below.
i.	40 CFR Part 63, Subpart IIII	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>See Sections c)(5) and d)(4), below</p>

(2) Additional Terms and Conditions

- a. The 14.1 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- b. The hourly natural gas emission limitations are based on potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.



- c. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(17).
 - d. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
 - e. OAC rule 3745-17-11(A)(1)(j) exemption for surface coating processed (eg. Sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) applicable methods. This source meets this exemption therefore 17-11(C) does not apply.
 - f. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.
 - g. Additional natural gas combustion burners (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity for this emissions unit K002 remains below 32.353 MMBTU/hr. The installation of additional natural gas burners to this emissions unit will not require a permit modification provided that the modifications to the emissions unit comply with the emission limitations for natural gas sources specified in Section b)(1)a and b)(1)b. of this permit. An accurate list of the natural gas combustion burners in this emissions unit shall be maintained by the facility and made available to Ohio EPA staff upon request.
- c) **Operational Restrictions**
- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - (2) The permittee shall burn only natural gas in this emissions unit.
 - (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.



d) Monitoring and/or Recordkeeping Requirements

- (1) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. 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 incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and
 - b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

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.

- (2) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (3) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents;
 - c. the amount of each coating employed, in gallons per month, excluding water and exempt solvents;
 - d. the VOC generated from each coating, in tons per month (the summation of [{"b" x "c"} / 2000 lbs/ton]);
 - e. the total VOC generated by all coating employed in this emissions unit, in tons per month (the summation of all "d" for all coating employed in this emissions unit);
 - f. the total controlled VOC emissions, for all the coatings employed, in tons per month (the summation of [{"e" x the capture efficiency} x (1- the control efficiency)] + [{"e" x (1- the capture efficiency)}]); and



- b. The total number of units processed per rolling 12 month summation (the total number of unit processed, for the current month (“a”) plus the total number of units processed for the 11 previous calendar months.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1), above.;
 - b. all instances when a fuel other than natural gas was burned in this emissions unit;
 - c. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing an exceedance of the VOC content limit of 3.0 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Southwest District Office within thirty (30) days after the end of the calendar month in which the exceedance occurs.
- (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:
3.0 lbs VOC/gallon of coating, excluding water and exempt solvent, as applied.

Applicable Compliance Method:

Compliance with this limit shall be determined through the record keeping requirements established in this permit.
 - b. Emission Limitations:
0.06 lb PE (filterable)/hr;
0.02 lb SO₂/hr;



3.3 lbs NOx/hr;
 2.8 lbs CO/hr; and
 0.2 lb VOC/hr.

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (32,353 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.

* for NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit. Prior to any modification that would cause the total combined heat input of all natural gas fired burners associated with this emissions unit to exceed 32.353 mmBTU/hr., the permittee shall apply for and obtain all appropriate air pollution permits.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10

c. Emission limitation:

14.1 lbs VOC/hr

The hourly emission limitation is based on the following equation:

$$E_h = (VOC_u \times B_e) + \{[VOC_u \times (1 - B_e)] \times (1 - D_e)\}$$

Where:

HER = maximum Hour Emission Rate, in lbs of VOC per hour;

VOC_u = the maximum VOC usage of 60.01 pounds (this is based upon maximum usage and maximum VOC content for both the sealer materials and deadner materials);



Be = the maximum uncaptured emissions from the booth based upon engineering estimates of 15% or 0.15¹; and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

Applicable Compliance Method:

Compliance is based on the assumption that the above data represents the maximum production rate, minimal capture efficiency, and minimal destruction efficiency of these emissions unit, its ventilation system, and control device. Any changes in these assumptions may trigger additional air pollution permit review.

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

¹. Based upon the analytical test results of the deadner and sealer materials employed in this emissions unit, it has been concluded that the evaporation losses of solvents prior to and after the oven is negligible. Therefore, it is reasonable to assume that the average capture efficiency is much higher than the 85%, by weight, used for the calculations of VOC emissions. Hence, capture efficiency testing is not required for this emissions unit.

d. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart IIII 63.3091 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart IIII, the permittee shall demonstrate compliance using the applicable methods detailed in 63.3150 through 63.3152 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.

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

- a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.
- c. The following test methods shall be employed to demonstrate compliance:

Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);



Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);

Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream);
and

Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

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

- (3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.



Draft Permit-to-Install
HONDA OF AMERICA, EAST LIBERTY PLANT
Permit Number: P0113358
Facility ID: 0546000117
Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.



6. K003, Guidecoat Line

Operations, Property and/or Equipment Description:

Primer/Surfacer coating booths with manual and robotic application equipment, and natural gas-fired air supply houses, bake ovens and thermal oxidizer

- 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 operations(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. 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.	ORC 3704.03(T)	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007. 149.9 lbs VOC per hour. 5.4 pounds of particulate emissions (PE) per hour, from overspray. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.14 lb PM10/hr; 4.48 lbs NOx/hr; 6.26 lbs CO/hr; and 0.41 lb VOC/hr.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Emissions from natural gas combustion associated with this emissions unit (includes drying ovens, air supply houses, and incinerator):



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.04 lb SO ₂ /hr. See section b)(2), below.
c.	OAC paragraph 3745-31-05(A)(3)(b)(ii), as effective 12/01/06	See section b)(2), below.
d.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC emissions applies to this emissions unit. The PAL for CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC emissions from this facility as specified in B.2.
e.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
g.	40 CFR, Part 60, Subpart MM	VOC emissions from the use of guidecoat in this emissions unit exceed 1.40 kg/liter (11.68 lbs/gal) of applied solids.
h.	OAC rule 3745-21-09(C)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to 40 CFR, Part 60, Subpart MM.
i.	OAC rule 3745-18-06(E)	See section b)(2), below.
j.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
k.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.
l.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
m.	OAC rule 3745-17-07(A) (for the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
n.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. The 149.9 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- b. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- c. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-



11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

d. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

e. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

f. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

g. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.

h. Additional natural gas combustion sources (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity for the source remains below 74.5 MMBTU/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a and b)(1)b. of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265



changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- j. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur dioxide (SO_x) emissions from this emissions unit since the "controlled" potential to emit is less than ten tons per year.

- k. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

- i. Section b)(1)a.;
- ii. Section b)(2)a., b., and f.;
- iii. Section c)(2);
- iv. Section d)(5);
- v. Section e)(1)a.;
- vi. Section e)(2); and
- vii. Section f)(1)a. c. and d.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coating.
- (4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.



- (5) The oven exhaust/thermal incinerator inlet system shall be equipped with an air pressure switch(s) that monitor(s) the operation of the oven exhaust/incinerator inlet capture system while the thermal incinerator is being employed and the oven associated with the emission unit is processing units. A lockout system shall be established and maintained that will halt the processing of units through the oven associated with the emission unit until the air pressure switch(s) indicates that the oven exhaust/thermal incinerator inlet has returned to normal operational conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. 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 incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and
 - b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

- (2) The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
 - a. the name and identification number of each coating;
 - b. the amount of each coating employed, in gallons per month;
 - c. the VOC content of each coating employed, in pounds of VOC per gallon;
 - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids; and



- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

- (3) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
- (4) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- (6) if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;
 - a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances when a fuel other than natural gas was burned in this emissions unit;
 - b. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings;
 - c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above;
 - d. all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.46 kg/liter (11.68 lbs/gal) of applied solids; and
 - e. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:
 - a. all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

- b. Emission Limitation:

1.40 kg of VOC/ liter (11.68 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all guide coatings employed.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

- c. Emission Limitations:

5.4 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$



where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the record keeping requirements established in this permit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitations:

0.14 lb PM10/hr;

0.04 lb SO2/hr;

4.48 lbs NOx/hr;

6.26 lbs CO/hr; and

0.41 lb VOC/hr

The above allowable were determined based on the following information:

The hourly allowable emission limitations for PM10/PM, SO2, CO and VOC were established by multiplying the maximum natural gas usage rate (74,500 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

The hourly allowable emission limitation for NOx was established based on the summation of the following:

multiplying the maximum gas usage rate for uncontrolled burners (15,000 cu ft/hr) by the emission factor for uncontrolled NOx, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

multiplying the maximum gas usage rate to low-NOx burners (59,500 cu ft/hr) by the emission factor for low-NOx, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*



* for NOx: 100 lbs NOx/mm cu. ft.; for low-NOx: 50 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be assumed based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10.

e. Emission limitation:

149.9 lbs VOC per hour

The above allowable is established based on the following equation:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

Where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents;

Ce = capture efficiency (as determined during the most recent compliance demonstration); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance demonstration).

Applicable Compliance Method:

If required, compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.



f. Emission Limitation:

Visible PE from overspray associated with this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9. \

g. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

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

- a. Emission testing shall be conducted at least once every five years after issuance of the permit, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA.
- b. Destruction efficiency testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit as specified in section f) of this permit and accordance with OAC rule 3745-21-09(C)(4).
- c. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 thru 4, of 40 CFR, Part 60, Appendix A (for sample and velocity traverses); and
 - ii. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review



and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

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

- (3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

g) Miscellaneous Requirements

- (1) None.



7. Emissions Unit Group - Topcoat Lines: K005, K006,

EU ID	Operations, Property and/or Equipment Description
K005	Topcoat Line A
K006	Topcoat Line B

- 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 operations(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. 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.	ORC 3704.03(T)	Hourly emissions from the coating operation shall not exceed: 214.64 lbs VOC; and 10.8 lbs of particulate emissions (PE), from overspray. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 3.8 lbs NOx/hr; and 6.03 lbs CO/hr.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.26 lb PM10/hr; 0.04 lb SO2/hr; and 0.39 lb VOC/hr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible PE shall not exceed 5% opacity, as a 6-minute average.</p> <p>The requirements of this rule include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B), 3745-18-06(E)(2) and 3745-31-05(D).</p> <p>See section b)(2)h., below.</p>
c.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)i., below.
d.	OAC rule 3745-31-32(A)(6)	<p>The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.</p>
e.	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
g.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
h.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		units K005, K006, K007, K008, K009 and K012, combined).
i.	OAC rule 3745-18-06(E)	See Section b)(2), below.
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
k.	OAC rule 3745-17-07(A)(from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
l.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.
m.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below
n.	40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- b. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.



- c. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- d. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- e. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.
- f. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.
- g. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.
- h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- i. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the sulfur dioxide (SO₂) and PM₁₀ emissions from this emissions unit since the “controlled” potential to emit is less than ten tons per year.

- j. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

- i. Section b)(1)a.;
- ii. Section b)(2)a.; and
- iii. Section f)(1)a.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.
- (4) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;



- c. the VOC content, in pounds of VOC per gallon;
- d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids; and
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (2) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. 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 incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and
 - b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

- (3) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
- (4) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.



- (6) If a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;
 - a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances when a fuel other than natural gas was burned in this emissions unit;
 - b. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings;
 - c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
 - d. all days when the oven exhaust capture system was not operational while the oven associated with the emissions unit was processing units.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:
 - a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or
 - b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.



f) Testing Requirements

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

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitations:

0.26 lb PM10/hr;

0.04 lb SO₂/hr;

3.79 lbs NO_x/hr;

6.03 lbs CO/hr; and

0.39 lb VOC/hr.

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (71,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

Multiplying the maximum gas usage rate for uncontrolled burners (4,000 cu ft/hr) by the emission factor for uncontrolled NO_x, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

Multiplying the maximum gas usage rate to low-NO_x burners (67,800 cu ft/hr) by the emission factor for low-NO_x, AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NO_x: 100 lbs NO_x/mm cu. ft.; for Low NO_x, 50 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit..



If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10

c. Emission limitation:

214.64 lbs VOC per hour

The above limitation was established based on the following equation:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

Applicable Compliance Method:

If required, compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.

d. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.



Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping established in this permit.

f. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

g. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.



Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA.
 - b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit as specified in section f) of this permit and in accordance with OAC rule 3745-21-09(C)(4).
 - c. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.



- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

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

- (3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

g) Miscellaneous Requirements

- (1) None.



8. K007, Primary Topcoat On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, and bake 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 operations(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. 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)	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007. 89.3 lbs VOC per hour. 5.19 pounds of particulate emissions (PE) per hour, from overspray. Emissions from natural gas combustion in the drying oven and air supply houses for K007 and K008, combined, shall not exceed the following: 0.21 lb PM10/hr; 0.025 lb SO2/hr; 4.08 lbs NOx/hr; 3.43 lbs CO/hr; and 0.22 lb VOC/hr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC emissions applies to this emissions unit. The PAL for CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
e.	40 CFR, Part 60, Subpart MM	1.40 kg of VOC/ liter (11.68 lbs of VOC/gallon) of applied solids, as a monthly volume weighted average guide coating.
f.	40 CFR, Part 60, Subpart MM, 60.392(c)	<p>VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).</p> <p>See Sections d), and e), below.</p>
g.	OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average. See Sections d), and e), below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	OAC rule 3745-21-09(C)(1)	For a prime coat coating shall not exceed, 1.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, or, if a control system is employed, 2.6 pounds of VOC per gallon of solids.
i.	OAC rule 3745-18-06(E)	See section b)(2), below.
j.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.
k.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.
l.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
m.	OAC rule 3745-17-07(A) (for the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
n.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. The 89.3 lbs VOC per hour limitation was established for permitting purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary



to establish record keeping and reporting requirements to ensure compliance with this limit.

- b. The emission limitations for PM₁₀, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for permitting purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations
- c. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- d. The PE from direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11
- e. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

- f. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.

- g. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a., and b.;



- iii. Section c)(1);
 - iv. Section d)(4);
 - v. Section e)(1)a.;
 - vi. Section e)(2); and
 - vii. Section f)(1)d. e. and f.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in this emissions unit.
 - (2) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.
 - (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
 - a. the name and identification number of each coating;
 - b. the amount of each coating employed, in gallons per month;
 - c. the VOC content of each coating employed, in pounds of VOC per gallon;
 - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids; and
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).
 - (2) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:



- a. the name and identification number of each topcoat employed;
- b. the number of gallons employed of each coating;
- c. the VOC content, in pounds of VOC per gallon;
- d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids. and
- i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198).

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (3) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
 - (4) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
 - (6) If a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;
 - a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



- a. all instances when a fuel other than natural gas was burned in this emissions unit; and
- b. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:

- a. all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;
- b. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or
- c. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.



b. Emission Limitation:

1.40 kg of VOC/ liter (11.68 lbs of VOC/gallon) of applied solids, as a monthly, volume-weighted average, from all guide coating employed.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

c. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

d. Emission Limitation:

1.47 kg VOC/liter of applied solids, as a monthly, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

e. Emission Limitations:

5.19 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;



Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance with the allowable particulate emission (PE) limitation shall be determined through the record keeping requirements established in this permit and maintenance of the overspray control system.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

f. Emission Limitations:

0.21 lb PM10/hr;

0.025 lb SO₂/hr;

4.08 lbs NO_x/hr;

3.43 lbs CO/hr; and

0.22 lb VOC/hr

The above allowable were determined based on the following information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* for NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PE/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

*** All PE is assumed to be PM10



g. Emission limitation:

89.3 lbs VOC per hour

The above allowable is established based on the following equation:

$$\text{HER} = (\text{Cu} \times \text{VC})$$

Where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined the potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

h. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

i. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.



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Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.



9. K008, Secondary Topcoat On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, and bake 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 operations(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. 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)	The emissions from this emissions unit shall not exceed: 8.7 lbs volatile organic compounds (VOC) per hour ; and 0.42 pounds of particulate emissions (PE) per hour, from overspray. Emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following: 0.21 lb PM10/hr; 0.025 lb SO2/hr; 4.08 lbs NOx/hr; 3.43 lbs CO/hr; and 0.22 lb VOC/hr.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-07(A)(1) (from overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
e.	40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
g.	OAC rule 3745-18-06(E)	See Section b)(2), below
h.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.
i.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See Section b)(2), below
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
k.	OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
l.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. The 8.7 lbs VOC per hour limitation was established for permitting purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- b. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for permitting purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- c. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- d. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.



- e. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

- f. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.

- g. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

- i. Section b)(1)a.;
- ii. Section b)(2)a., and b.;
- iii. Section c)(1);
- iv. Section d)(2);
- v. Section e)(1)a.; and
- vi. Section f)(1)b. d. and e.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.
- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart III, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- (2) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (3) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
- (4) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids. and
 - i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198).

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (5) If a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;
 - a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances when a fuel other than natural gas was burned in this emissions unit; and
 - b. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:
 - a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or
 - b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1), of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.



b. Emission Limitations:

8.7 pounds of VOC per hour

The above allowable is based on the following equation:

$$HER = M_{cu} \times VOC_c$$

Where:

HER = Hour Emission Rate, lbs per hour;

M_{cu} = Maximum Hourly Coating Usage, gallons per hour; and

VOC_c = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined the potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

c. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

d. Emission Limitations:

0.42 pounds of particulate emissions (PE) per hour, from overspray

The above allowable is based on the following equation:

$$HER = [M_{cu} \times H_{sc} \times (1 - T_e)] \times (1 - C_e)$$

Where:

HER = Hour Emission Rate, lbs per hour;

M_{cu} = Maximum Hourly Coating Usage, gallons per hour;



Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred;

and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping established in this permit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

e. Emission Limitations:

0.21 lb PM10/hr;

0.025 lb SO₂/hr;

4.08 lbs NO_x/hr;

3.43 lbs CO/hr; and

0.22 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* for NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.



** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM₁₀, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

*** All PM is assumed to be PM₁₀

f. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

g) Miscellaneous Requirements

- (1) None.



10. K009, Wax/Polish Coating Line

Operations, Property and/or Equipment Description:

Coating booths with manual wax application equipment and natural gas-fired air supply houses

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 operations(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. 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)	<p>The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based on a monthly volume weighted average of all the coatings employed in this emissions unit.</p> <p>[this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(d)]</p> <p>87.2 lbs VOC per hour;</p> <p>0.29 lb particulate emissions (PE) per hour, for over spray</p> <p>Emissions from natural gas combustion in the air supply houses:</p> <p>0.07 lb PM10/hr; 0.009 lb SO2/hr; 1.49 lbs NOx/hr;</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.25 lbs CO/hr; and 0.08 lb VOC/hr.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
e.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoat employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
g.	OAC rule 3745-18-06(E)	See Section b)(2), below
h.	OAC rule 3745-21-09(U)(2)(f)	The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based on a monthly volume weighted



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		average of all the coatings employed in this emissions unit. See Section b)(2), below
i.	OAC rule 3745-17-11(B) (for the air supply houses associated with this emissions unit)	See Section b)(2), below
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
k.	OAC rule 3745-17-07(A) (for the air supply houses associated with this emissions unit)	See Section b)(2), below
l.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. The 87.2 lbs VOC per hour limitation was established for permitting purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- b. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the air supply houses were established for permitting purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.



- c. The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).
- d. The PE from the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- e. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), The director has determined that the otherwise applicable emission limitation(s) in paragraph (U)(1) of this rule is technically or economically infeasible and has established an alternative reasonably available control technology emission limitation. The alternative limitation shall be the lowest emission limitation that the coating line is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.
- f. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), The director has determined that the otherwise applicable emission limitation(s) in paragraph (U)(1) of this rule is technically or economically infeasible and has established an alternative reasonably available control technology emission limitation. The alternative limitation shall be the lowest emission limitation that the coating line is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.
- g. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

- h. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.



- i. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a., and b.;
 - iii. Section c)(1);
 - iv. Section d)(2);
 - v. Section e)(1)a. and b.; and
 - vi. Section f)(1)b., c., d., and e.
- c) **Operational Restrictions**
 - (1) The permittee shall burn only natural gas in this emissions unit.
 - (2) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.
 - (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
 - i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198).



These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- (2) The permittee shall maintain the following monthly records on all coatings other than topcoats employed in this emissions unit:
 - a. the name and identification number of each coat employed;
 - b. the amount of each coat employed, in gallons per month, excluding water and exempt solvents;
 - c. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents;
 - d. the calculated VOC generated from each coat employed, in pounds of VOC per month, (the summation of "b" x "c");
 - e. the combined VOC emissions from all of the non-topcoat coatings employed in this emissions unit, in pounds of VOC per month (the summation of "d" from all of the non-topcoat coatings employed in this emissions unit);
 - f. the combined non-topcoat coating usage employed in this emissions unit, in gallons per month, (summation of "b" from all of the non-topcoat coatings employed in this emissions unit); and
 - g. the volume weighted average VOC content of all non-topcoat coatings employed in this emissions unit, in pounds of VOC per gallon, excluding water and exempt solvents.
- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- (4) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
- (5) if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;
 - a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. the VOC content of the coatings employed in this emissions unit, excluding topcoat operations, exceeds 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit;
 - b. all instances when a fuel other than natural gas was burned in this emissions unit; and
 - c. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:
 - a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or
 - b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1), of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average [from all topcoat operations - emissions units K005, K006, K007, K008, K009* and K012*, combined].



Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitations:

The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based on a monthly volume weighted average of all the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in this permit.

c. Emission Limitations:

0.29 pounds of particulate emissions (PE) per hour, from overspray

The above allowable is based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping requirements established in this permit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.



d. Emission Limitations:

87.2 pounds of VOC per hour

The above allowable is based on the following equation:

$$\text{HER} = \text{Mcu} \times \text{VOCc}$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour; and

VOCc = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

e. Emission Limitations:

0.07 lb PM10/hr;

0.009 lb SO₂/hr;

1.49 lbs NO_x/hr;

1.25 lbs CO/hr; and

0.08 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (14,850 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.



Applicable Compliance Method:

Compliance shall be based on the record keeping established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM₁₀, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM₁₀

f. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

h. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.



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g) Miscellaneous Requirements

- (1) None.



11. K011, Final Repair

Operations, Property and/or Equipment Description:

Coating booths and area including manual coating applicators for final off-line repair and infrared bake ovens/lamps

- 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 operations(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. 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)	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 15.8 lbs per hour; and 1.26 lbs of particulate emissions (PE) per hour Emissions from natural gas combustion: 0.04 lb PM10/hr; 0.005 lb SO2/hr; 0.85 lbs NOx/hr; 0.72 lb CO/hr; and 0.05 lb VOC/hr.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
d.	OAC rule 3745-21-09(C)(1)(d)	4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average
e.	OAC rule 3745-18-06(E)	See section b)(2), below.
f.	OAC rule 3745-17-11(B) (for the oven associated with this emissions unit)	See section b)(2), below.
g.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
h.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
i.	OAC rule 3745-17-07(A) (for the oven associated with this emissions unit)	See section b)(2), below.

(2) Additional Terms and Conditions

- a. The 15.8 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- b. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- c. The uncontrolled mass rate of particulate emissions (PE) from all the fuel burning equipment associated with this emissions unit is less than 10 pounds/hour.



Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

d. The PE for the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

e. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

f. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.

g. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

- i. Section b)(1)a.;
- ii. Section b)(2)a., and b.;
- iii. Section c)(1);
- iv. Section d)(2);
- v. Section e)(1)a.; and
- vi. Section f)(1)b., c., and e.



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall operate the fabric filter system within the booths whenever this emissions unit is in operation using a spray coating application. This restriction does not apply to the use of air-dry lacquer coatings applied in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that list the following information on the coatings employed in this emissions unit:
 - a. the name and identification number of each coating;
 - b. the number of gallons employed;
 - c. the VOC content, in pounds per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the daily volume weighted VOC content of all coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
 - f. the water and exempt solvents content, in percent by volume; and
 - g. the nonvolatile (solids) content, in percent by volume.
- (2) For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of the fuel burned.
- (3) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances when a fuel other than natural gas was burned in this emissions unit; and
 - b. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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



- a. all exceedances of the allowable 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average.

These exceedance records shall be sent within forty five (45) days following the exceedance.

- (3) If a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;

- a. The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1), of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

4.8 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements established in this permit.

- b. Emission Limitation:

0.04 lb PM10/hr;

0.005 lb SO₂/hr;

0.85 lbs NO_x/hr;

0.72 lb CO/hr; and

0.05 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (8,525 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*



* For NOx: 100 lbs NOx/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO2, 0.6 lb SO2/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit..

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NOx, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO2, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM10

c. Emission Limitation:

15.8 lbs VOC/hr;

The above allowable was based on the following equation:

$$HER = [Cu * VC]$$

Where:

HER = maximum Hourly Emission Rate, in lbs of VOC/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined the potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

d. Emission Limitation:

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



Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation:

1.26 pounds PE/hr, from coating overspray

The above allowable was based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping requirements established in this permit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

f. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.



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g) Miscellaneous Requirements

- (1) None.



12. K012, Specialty Topcoat Coating and On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat coating and on-line repair booths, natural gas-fired air supply house, bake oven, and thermal oxidizer.

- 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 operations(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. 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)	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 17.4 lbs per hour; and 0.5 lbs of particulate emissions (PE) per hour. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.14 lb PM10/hr; 0.02 lb SO2/hr; 2.85 lbs NOx/hr; 2.40 lbs CO/hr; and 0.15 lb VOC/hr.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.
e.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
g.	OAC rule 3745-21-09(U)(1)(i)	3.0 lbs of VOC/ gallon of coating, minus water and exempt solvent, as applied (when coating miscellaneous metal parts)
h.	OAC rule 3745-18-06(E)	See section b)(2), below.
i.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.
j.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.
k.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	See section b)(2), below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
l.	OAC rule 3745-17-07(A) (from the indirect-fired oven zones associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
m.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. The VOC emissions from the use of topcoats that are baked in the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

The requirement to vent emissions to a thermal oxidizer does not include emissions from any topcoat that is air-dried. Air-dry coatings are materials that do not require baking to fully cure and baking is not required to ensure the performance characteristics of the coatings.
- b. The 17.4 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- c. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- d. The uncontrolled mass rate of particulate emissions (PE) from all the direct-fired fuel burning equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-



11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

e. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

f. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

g. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.

h. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

- i. Section b)(1)a.;
- ii. Section b)(2)b., and c.;
- iii. Section c)(2);
- iv. Section d)(4);
- v. Section e)(1)b.; and
- vi. Section f)(1)b., c., and e.

c) Operational Restrictions

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units and applying any topcoat that requires baking, shall not be more than 50 degrees Fahrenheit



(28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- (4) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids; and
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- (2) The permittee shall maintain the following monthly records on all coatings used to coat miscellaneous metal parts in this emissions unit:
 - a. the name and identification number of each coat employed; and
 - b. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.



- (4) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (5) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units and applying any topcoat that requires baking. 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 incinerator, when the oven associated with this emissions unit is processing units and applying topcoat that requires baking, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the oven associated with this emissions unit is processing units.
- (6) The permittee shall maintain the following monthly records on all non-topcoat coating used to coat the surface of automobiles and light-duty trucks in this emissions unit:
 - a. the name and identification number of each coating employed; and
 - b. the VOC content of each coating employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
 - (7) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
 - (8) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
 - (9) if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials, to be credited to the calculations of the VOC emissions, recorded and calculated as stated under the terms and conditions for K001, K003, K005, K006, K007, K008, K009, K011, K012, P001, P003, P014, P016, and P017 in pounds or tons per month;



The permittee may maintain the records and calculations of emissions from cleanup and purge materials collectively or separately from the above emissions units. These records and calculations shall be made available upon request.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1), above;
 - b. all instances when a fuel other than natural gas was burned in this emissions unit; and
 - c. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit to the director a copy of records indicating exceedance of the following limitations:
 - a. all exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units; and/or
 - b. all exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units.

These exceedance records shall be sent within thirty days following the end of the calendar month in which the exceedance occurred.

- (3) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- (4) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing an exceedance of the VOC content limit of 3.0 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Southwest District Office within thirty (30) days after the end of the calendar month in which the exceedance occurs

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in this permit.

b. Emission Limitations:

0.14 lb PM10/hr;

0.02 lb SO₂/hr;

2.85 lbs NO_x/hr;

2.40 lbs CO/hr; and

0.15 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (28,500 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*

* For NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM10, 1.9 lbs PM10/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM10, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM10.



c. Emission limitation:

17.4 lbs VOC per hour

The above allowable were determined based on the following equation(s) and information:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$\text{HER} = \{[(\text{Cu} \times \text{VC}) \times \text{Ce}] \times (1 - \text{De})\} + [(\text{Cu} \times \text{VC}) \times (1 - \text{Ce})]$$

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

d. Emission Limitation:

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

Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) and 40 CFR Part 60, Appendix A, Method 9.



e. Emission Limitations:

0.5 pounds of particulate emissions (PE) per hour, from overspray

The above allowable were determined based on the following equation(s) and information:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on the use of an overspray control system and the record keeping requirements established in this permit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

f. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in this permit.

g. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.



Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

- (2) If required permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit. If this source applies only air dry coatings that do not require baking destruction removal efficiency and capture testing shall not be required.
 - b. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by Ohio EPA Southwest District Office.



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

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

- (3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

g) Miscellaneous Requirements

- (1) None.



13. K013, Assembly Miscellaneous Coating Line

Operations, Property and/or Equipment Description:

Application of primer on metal surfaces for the installation of fixed quarter and windshield glass.

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 operations(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. 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)	The monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, shall not exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents, (this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(i), See section b)(2), below..
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>
d.	OAC rule 3745-21-09(U)(2)(f)	<p>Alternative reasonably available control technology emission limitation, when coating miscellaneous metal parts.</p> <p>The monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, shall not exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents, (this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(i),</p> <p>See section b)(2)., below</p>
e.	OAC rule 3745-17-11(C)	See Section b)(2)., below.

(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), The director has determined that the otherwise applicable emission limitation(s) in paragraph (U)(1) of this rule is technically or economically infeasible and has established an alternative reasonably available control technology emission limitation. The alternative limitation shall be the lowest emission limitation that the coating line is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.



- b. OAC rule 3745-17-11(A)(1)(h) and (j) exemption for surface coating processes (eg. Sealers, adhesives, roll coatings, brush coatings and deadeners) that employ airless spray, brush coating and bead-type (extrusion) application methods. This source meets this exemption therefore 17-11(C) does not apply.
- c. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.; and
 - ii. Section b)(2)b.
- c) Operational Restrictions
 - (1) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for all the miscellaneous metal coatings employed for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (in lbs/gallon, excluding water and exempt solvents) of each coating, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the monthly, volume-weighted average VOC content of all the coatings (in lbs/gallon, excluding water and exempt solvents), as applied, calculated in accordance with OAC rule 3745-21-10(B); and
 - e. the total VOC emissions for all the coatings employed, in pounds, i.e., multiply the VOC content of each coating employed (b) by the respective amount, in gallons, of each coating employed (c), and sum the results for all the coatings employed.
 - (2) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:



- a. the monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) This emissions unit shall be operated in accordance with 40 CFR Part 63, Subpart IIII, and shall employ all applicable operating limits and work practices standards as detailed in 40 CFR 63.3093 through 63.3101.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

6.54 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements established in this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

- (1) None.



14. K015, Plastic Coating Line

Operations, Property and/or Equipment Description:

Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.

- 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 operations(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. 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)	<p>The VOC emissions from this emissions unit shall not exceed 3512 pounds per day.</p> <p>The particulate emissions (PE) from this emissions unit shall not exceed 7.46 pounds per hour nor 172 lbs PM/day.</p> <p>Emissions from natural gas combustion in the drying oven:</p> <p>0.47 lb PM/hr, 0.04 lb SO₂/hr, 6.12 lbs NO_x/hr, 5.14 lbs CO/hr, and 0.67 lb TOC/hr.</p>
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC emissions applies to this emissions unit. The PAL for CO, NO _x , PM, PM ₁₀ , PM _{2.5} , SO _x , and VOC is listed in the facility-wide



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.</p>
c.	<p>40 CFR 63 Subpart P (Surface coating of Plastic Parts and Products)</p>	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart P (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR Part 63.4491.</p> <p>Should Subpart P be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>This rule shall not apply if the permittee elects to include this emissions unit in the affected source subject to 40 CFR Part 63 Subpart III.</p>
j.	<p>OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)</p>	<p>Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.</p>
e.	<p>OAC rule 3745-17-11(C)(3)</p>	<p>See Section b)(2), below.</p>
f.	<p>OAC rule 3745-18-06(E)</p>	<p>See section b)(2), below.</p>
g.	<p>40 CFR Part 63 Subpart III (40 CFR 63.3080 - 3176)</p>	<p>If the permittee elects to include this emission unit in the affected source subject to 40 CFR Part 63 Subpart III, the permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart III, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. The above pound per hour and pound per day limitations are based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with these limits.
- b. OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI which was issued after Jan 1, 1990.

OAC rule 3745-17-11(C)(3) exempts this emissions unit from the requirements of OAC rules 3745-17-11(C)(1) & (2) since particulate emission limitations and control measures are based on best available technology. The BAT determination is based on an existing PTI, which was issued after Jan 1, 1990. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

- c. Since this emissions unit is equipped to burn only natural gas it is in compliance with the requirements of OAC rule 3745-18-06.

Prior to modifying this emissions unit that would allow for the use of any fuel other than natural gas, the permittee shall apply for and obtain all appropriate air pollution permits.

- d. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a.,
 - iii. Section c)(3);
 - iv. Section d)(3);



- v. Section e)(1)c., and
- vi. Section f)(1)a., b., and c.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4480 through 63.4501. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.
- (2) (4) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63 Subpart IIII, the permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101
- (3) The permittee shall operate an overspray control system in order to minimize and/or eliminate particulate emissions whenever this emissions unit is spray applying coatings.
- (4) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.
- (2) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63, Subpart IIII, this emissions unit shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131
- (3) The permittee shall maintain records that document any time periods when the overspray control system was not in service when the emissions unit was spray applying coatings.
- (4) For each day during which the permittee burns fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. any record showing that the overspray control system was not in service when the emissions unit was spray applying coatings; and/or
 - b. all instances when a fuel other than natural gas was burned in this emissions unit.



The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR 63, Subpart IIII for this emissions unit.
- (3) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63, Subpart IIII, the permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through -63.3131.

f) Testing Requirements

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

a. Emission Limitation:

7.46 pounds of PE per hour; and
 172 pounds of PE per day, from overspray.

The above limitations are based on the following equations:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

$$DER = HER \times 24$$

Where:

HER = Hourly Emission Rate, in pounds of PE per hour;

DER = Daily Emission Rate, in pounds of PE per day;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance will be assumed based on the record keeping requirements established in this permit.



If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

3512 lbs VOC/day

The above limitations are based on the following equations:

$$DER = \{[(C1 \times VOCc1) + (C2 \times VOCc2) + \text{etc...}] + [(S1 \times VOCs1) + (S2 \times VOCs2) + \text{etc...}]\} - (R) \times 24$$

Where:

DER = Daily Emission Rate, in pounds;

C = usage of coating, in gallons per hour;

S = usage of purge and cleanup solvent, in gallons per hour;

VOCc = organic compound content of the coatings, in pounds per gallon;

VOCs = organic compound content of the solvents, in pounds per gallon;

R = amount of VOC recovered in the purge system, in pounds; and 1,2, etc.. = individual coating, solvent, and specific VOC content for each coating or solvent.

Applicable Compliance Method:

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

c. Emission Limitation:

0.47 lb PM/hr,

0.04 lb SO₂/hr,

6.12 lbs NO_x/hr,

5.14 lbs CO/hr, and

0.67 lb TOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (61,200 cu.ft/hr) by the emission factor* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98.*



* For NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM₁₀, 1.9 lbs PM₁₀/mm cu. ft.; for VOC, 5.5 lbs VOC/mm cu. ft.; and for SO₂, 0.6 lb SO₂/mm cu. ft.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements established in this permit.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PM₁₀, Methods 1 - 4 and 201; and for SO₂, Methods 1 - 4 and 6.

*** All PM is as assumed to be PM₁₀

d. Emission Limitation:

HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

Applicable Compliance Method:

The permittee shall demonstrate compliance using the applicable requirements as detailed in 40 CFR Part 60 Subpart P, 63.4540 through 63.4568 or the applicable requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

e. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

f. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart P, in accordance with 40 CFR 63.4491.



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Applicable Compliance Method:

If applicable, see 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480 through 63.4581).

g. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3091.

Applicable Compliance Method:

If applicable, see 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.



15. K024, Spray Melt Sheet Operation

Operations, Property and/or Equipment Description:

Spray Melt Sheet Operation

- 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 operations(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. 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)	Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide PM, PM10, PM2.5, and VOC emissions applies to this emissions unit. The PAL for PM, PM10, PM2.5, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total PM, PM10, PM2.5, and VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents. See sections c), d), e), and f), below.
d.	OAC rule 3745-17-11(C)(3)	See Section b)(2), below.



(2) Additional Terms and Conditions

- a. The emission limitations for pounds of VOC emissions per hour, 24.7, are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with this limit.
- b. OAC rule 3745-17-11(A)(1)(j) exemption for surface coating processed (e.g. Sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) applicable methods. This source meets this exemption therefore 17-11(C) does not apply.
- c. VOC emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the oven associated with the emissions unit is processing units (vehicles). The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.
- d. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a., and
 - iii. Section f)(1)a.

c) Operational Restrictions

- (1) The permittee shall employ a thermal incinerator while the oven associated with this emissions unit is processing units. The thermal incinerator shall have a destruction removal efficiency of at least 90%.

The VOC capture efficiency is conservatively assumed to be 95 percent. The capture efficiency assumption is based upon supplier information and the low vapor pressure of the solvents in the coating, as applied. The percent capture efficiency shall be adjusted if monitoring or testing provides a more accurate estimate for this emissions unit.
- (2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time while the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated compliance.

d) Monitoring and/or Recordkeeping Requirements

- (1) When the thermal incinerator is being employed in order to assure compliance with applicable air pollution requirements while the oven associated with the emissions unit is processing units, the permittee shall operate and maintain a continuous temperature



monitor and recorder which measures and records the combustion temperature within the thermal incinerator. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. 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 incinerator, when the oven associated with the emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance; and
- b. the downtime, when the oven associated with the emissions unit is processing units, for the capture (collection) system, control device, and monitoring equipment

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above; and
 - b. all downtime of the capture (collection) system, control device, and monitoring equipment, when the oven associated with the emissions unit was processing units.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.0 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the end of the month in which the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emissions limitations specified in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission limitation:

Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour.



The above limitation is based on the following equation:

$$\text{HER} = \{[(\text{Cu} \times \text{VC}) \times \text{Ce}] \times (1 - \text{De})\} + [(\text{Cu} \times \text{VC}) \times (1 - \text{Ce})]$$

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

u = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

C = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency, assumed to be 95% (based on best available information from Honda to date); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

Applicable Compliance Method:

Compliance is based on the assumption that the above data represents the maximum production rate, minimal capture efficiency, and minimal destruction efficiency of these emissions unit, its ventilation system, and control device. Any changes in these assumptions may trigger additional air pollution permit review.

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

Based upon the analytical test results of the deadener and sealer materials employed in this emissions unit, it has been concluded that the evaporation losses of solvents prior to and after the oven is negligible. Therefore, it is reasonable to assume that the average capture efficiency is much higher than the 95%, by weight, used for the calculations of VOC emissions. Hence, capture efficiency testing is not required for this emissions unit.

b. Emissions Limitation:

The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings employed.

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



- a. Emission testing shall be conducted at least once every five years after issuance of the permit, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.
- c. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest District Office within 30 days following completion of the test(s). The permittee may



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request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Southwest District Office.

- (3) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit. USEPA Method 24 shall be used to determine the VOC content of the liquid organic cleanup/purge material recovered for the emissions unit included in this limit.

g) Miscellaneous Requirements

- (1) None.



16. P004, Surfacers Sanding

Operations, Property and/or Equipment Description:

Surfacers Sanding

- 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 operations(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. 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)	Use of fabric filters to minimize and/or eliminate particulate emissions (PE). Particulate (PE) emissions shall not exceed 0.88 lbs./hr.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide VOC, PM, PM10, and PM2.5 emissions applies to this emissions unit. The PAL for VOC, PM, PM10, and PM2.5 is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total VOC, PM, PM10, and PM2.5 emissions from this facility as specified in B.2.
c.	OAC rule 3745-17-07(A)	See section b)(2), below.
d.	OAC rule 3745-17-11	See section b)(2), below.

(2) Additional Terms and Conditions

- a. The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.



- b. The uncontrolled mass rate of particulate emissions (PE) from equipment associated with this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).

[Authority for term 3745-77-07(A)(1), 3745-17-11(C)]

- c. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

- i. Section b)(1)a.;
- ii. Section b)(2)a.,
- iii. Section c)(1),
- iv. Section d)(1);
- v. Section e)(1); and
- vi. Section f)(1)a.

c) Operational Restrictions

- (1) The permittee shall operate the filter system for the control of particulate emissions whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the particulate control system was not in service when the emissions unit was in operation.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any time periods when the particulate control system was not in service when the emissions unit was in operation.

This deviation report shall be submitted according to the specific requirements of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitations:

Particulate (PE) emissions of 0.88 lbs/hr.

The above allowable were determined based on the following equation(s) and information:

$$\text{HER} = [\text{Sum of all coatings sanded (Sv x Sd x Us)}] \times (1 - \text{Oc}\%)$$

Where:

HER = the maximum PE Hourly Emission Rate , in lbs/hr;

Sv = the sand volume produced, cubic feet per unit, (0.000215 cubic feet/unit, EDP, and 0.000268 cubic feet/hr, Primer);

Sd = density of sand, lbs/cubic ft, (84.29 lbs/cubic feet, EDP, and 118.56 lbs/cubic feet, primer);

Us = Number of units sanded, (88 units/hr); and

Oc% = Estimated Overall Capture and Control Efficiency, (assumed 80%).

Applicable Compliance Method:

Compliance based on the upkeep and maintenance on the filter system for this emissions unit so that it is maintained in proper operating conditions and is employed whenever this emissions unit is in operation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

(1) None.



17. P021, Plastic Parts Painting Miscellaneous Solvent Usage

Operations, Property and/or Equipment Description:

Miscellaneous solvent cleaning and solvent wiping of plastic parts. Solvent-moistened Rags; Used Rag Containers.

- 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 operations(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. 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)	Emissions of volatile organic compounds shall not exceed 970.8 lbs. VOC/day.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
c.	40 CFR Part 63, Subpart PPPP	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP.
d.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	See section B.13 of this permit for optional compliance method.



- (2) Additional Terms and Conditions
 - a. The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.
 - b. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a., and
 - iii. Section d)(1).
- c) Operational Restrictions
 - (1) As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in 63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed; and
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - (2) As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in 63.4530 of that subpart in the manner detailed in 63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.
- e) Reporting Requirements
 - (1) As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in 63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.



f) Testing Requirements

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

a. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP 63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in 63.4540 through 63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

b. Emission Limitation:

Emissions of volatile organic compounds shall not exceed 970.8 lbs. VOC/day.

Applicable Compliance Method:

Compliance shall be assumed based on the maximum potential processed through this emissions unit. Prior to any modifications that would increase the potential emissions and/or add additional pollutant(s), the permittee shall apply for and obtain all appropriate air pollution permits.

g) Miscellaneous Requirements

(1) None.



18. P045, Plastic Parts Coating Line Effluent System

Operations, Property and/or Equipment Description:

Effluent system used to control particulates related to the painting of plastic parts at Honda ELP.

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) b)(1)d., and d)(2), below.

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 paragraph 3745-31-05(A)(3), effective 11/30/01.	Use of low VOC emitting materials. Volatile organic compound (VOC)/organic compound (OC) emissions shall not exceed 1.2 pounds per hour.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06	See Section b)(2)b, below.
c.	OAC rule 3745-31-05(F) (Voluntary limits to assure that the emissions from this emissions unit are maintained under Title V significant emissions unit level)	VOC/OC emissions from this emissions unit shall not exceed 4.5 tons per rolling 12 month period.
d.	OAC rule 3745-21-07(M)	Exempt. See section b)(2)c., below.
e.	OAC rule 3745-114-01	Ohio Toxic Rule

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source since the potential to emit is less than ten tons per year.
 - c. Emissions unit is exempt under OAC rule 3745-21-07(A)(5), requirements shall not apply to any source, including any new source, for which installation commenced after the effective date of this rule, February 18, 2008.
 - d. The VOC/OC hourly limitation was established in section b)(1)a. of this permit to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each material employed;
 - b. the amount of each material employed, in gallons and/or pounds (tons), whichever is most appropriate;
 - c. the VOC/OC content of each material employed, in pounds per gallon and/or percent by weight, whichever is most appropriate;
 - d. the VOC/OC regretted from each material employed, in tons per month (the summation of $[(\text{"b"} \times \text{"c"}) / 2000 \text{ lbs/ton}]$);
 - e. the total VOC/OC regretted by all materials employed in this emissions unit, in tons per month (the summation of all "d" for all materials employed in this emissions unit); and
 - f. the rolling, 12-month total combined VOC/OC emitted from this emissions units, in tons (the total individual VOC/OC emitted, in tons, for the current month ("e") plus the total amount of VOC/OC emissions for the 11 previous calendar months).
 - (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be



less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

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

a. Any time when VOC/OC emissions from this emissions unit exceed 4.5 tons per rolling 12 month period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745 15 03(B)(1)(a)], [OAC rule 3745 15 03(C)], and [OAC rule 3745-77-Testing Requirements

f) 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 Limitations:

OC/VOC emissions of 1.2 pounds per hour

The above limitation is based on the following equation:

$$HER = ((DTu / D) \times OCc) + ((Flu / D) \times OCc) + ((Dfu / D) \times OCc) + ((Bio / D) \times OCc) \times Of$$

Where;

HER = Hourly emission rate, in pounds per hour;

DTu = Detack material usage, in pounds per hour, (7.0);

Flu = Flocculant usage, in pounds per hour, (4.0);

Dfu = Defoamer, in pounds per hour, (1.0);

Bio = Biocide usage, in pounds per hour, (2.0);

D = Material density, in pounds per gallon;

i. 10.05 pounds per gallon of Detack;

ii. 8.94 pounds per gallon of Flocculant;



- iii. 7.57 pounds per gallon of Defoamer; and
- iv. 8.57 pounds per gallon of Biocide.
OCc = OC/VOC content, in pounds per gallon;
- v. 0.01 pounds per gallon of Detack;
- vi. 1.10 pounds per gallon of Flocculant;
- vii. 2.10 pounds per gallon of Defoamer; and
- viii. 0.02 pounds per gallon of Biocide.

OF = Operational flexibility, 150%, (1.5), (accounts for unexpected but overall minor operational adjustments in the short term, but does not significantly affect overall annual and/or long term environmental impact..

Applicable Compliance Method:

Compliance shall be assumed based on the maximum usage rate and OC/VOC content as applied for in this permit. Prior to any modification that would increase above the above allowable and/or add additional unpermitted regulated pollutants emissions from this emissions unit, the permittee shall apply for and obtain all appropriate air pollution permits.

- b. Emission Limitations:

OC/VOC emissions of 4.5 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping in section d) of this permit.

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

- g) Miscellaneous Requirements

- (1) None.



19. R005, Injected Parts Coating Line

Operations, Property and/or Equipment Description:

Injected parts coating line, with air supply unit and natural gas fired drying 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 operations(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. 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.	ORC 3704.03(T)	The VOC/OC content of the coatings employed shall not exceed 1.0 pounds per gallon of coating, as based on a monthly volume weighted average, as applied.
b.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	<p>The controlled particulate emissions from overspray shall not exceed 3.95 pounds per hour.</p> <p>The liquid organic cleanup materials employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon.</p> <p>Emissions from the combustion of natural gas in this emissions unit shall not exceed:</p> <p>0.02 pounds of PE/PM10 per hour; 0.01 pounds of SO2 per hour; 1.0 pounds of NOx per hour; 0.84 pounds of CO per hour; and 0.06 pounds of VOC per hour.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2), below.
d.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions applies to this emissions unit. The PAL for CO, NOx, PM, PM10, PM2.5, SOx, and VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total CO, NOx, PM, PM10, PM2.5, SOx, and VOC emissions from this facility as specified in B.2.
e.	OAC rule 3745-17-10(B)	0.02 lb. of PE per MMBtu from the combustion of natural gas
f.	OAC rule 3745-17-11(C)	The use of an overspray control system.
g.	OAC rule 3745-17-07	Visible particulate emissions from the vent serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
h.	40 CFR Part 63, Subpart PPPP	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR Part 63.4491.</p> <p>Should Subpart PPPP be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>This rule shall not apply if the permittee elects to include this emissions unit in the affected source subject to 40 CFR Part 63 Subpart IIII.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176)	<p>If the permittee elects to include this emission unit in the affected source subject to 40 CFR Part 63 Subpart IIII, the permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091.</p> <p>Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p>

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still

exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), SO₂, NO_x, CO emissions from this emissions unit, and VOC emissions associated with the liquid organic cleanup material, and/or liquid organic additive from this emissions unit since the potential emissions are less than ten tons per year.



- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- d. The natural gas combustion limitations that were established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a., b., and c.;
 - ii. Section b)(2)a. and b.;
 - iii. Section c)(2);
 - iv. Section d)(8) and (10),
 - v. Section e)(1)a., b., and d., and
 - vi. Section f)(1)a., b, and c.

c) Operational Restrictions

- (1) The permittee shall install and operate an overspray control system that has a design efficiency of at least 95% for the control of particulate emissions. The control system shall be employed whenever this emissions unit is spray applying coatings. The overspray control system shall be maintained in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The fuel employed in the heaters and/or ovens shall be only natural gas.
- (3) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart P, in accordance with 40 CFR 63.4480 through 63.4501. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.
- (4) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63 Subpart IIII, the permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.



d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following monthly records.
 - a. The company identification of each coating and liquid organic additive/thinners employed in the coating operation;
 - b. The VOC/OC content of each coating and liquid organic additive/thinners employed in the coating operation, in pounds per gallon, as applied;
 - c. The amount of each coating and liquid organic additive/thinners employed in the coating operation, in gallon per month;
 - d. The VOC/OC emissions from the each coating and liquid organic additive/thinners employed in the coating operation, in pounds per month, (the summation of: (“(1)b.” x “(1)c.”); and
 - e. The monthly volume weighted average lb VOC/gal of coating, including any liquid organic additive/thinners employed, (the summation of: (“(1)d.” / “(1)c.”)).
- (2) This facility shall maintain the following monthly records.
 - a. The company identification of each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed;
 - b. The VOC/OC content of each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material, in pounds per gallon, as applied;
 - c. The amount of each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed, in gallon per month;
 - d. The VOC/OC emissions from each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed, in tons per month, (the summation of: [(“(1)b.” x “(1)c.”)/2000]); and
 - e. The rolling, 12-month total VOC/OC emissions. The rolling, 12-month summation of the total amount of VOC/OC emissions from the coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed (the total amount of VOC/OC emissions for the current month (“(1)d.”) plus the total amount combined of VOC/OC emissions for the 11 previous calendar months).
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the overspray control system being employed, 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 appropriate Ohio EPA District Office or local air agency upon request.



- (4) The permittee shall conduct periodic inspections of the overspray control system being employed 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.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the overspray control system being employed while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the overspray control system being employed 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 person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the overspray control system being employed was not in service when the emissions unit was spray applying coatings, as well as, a record of all operations during which the overspray control system 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.

- (8) For each day during which the permittee burns a fuel other than natural gas in the heaters and/or ovens. The permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (9) This facility shall maintain the following monthly records on the coatings employed in emissions unit R005:
 - a. the company identification of each coating material employed;
 - b. the coating usage, in gallons;
 - c. the density of each coating employed, in pounds per gallon;
 - d. the solids content in percent by weight;



- e. the amount of solids employed, in pounds;
 - f. the assumed transfer efficiency, 35% worst case;
 - g. the assumed overspray control efficiency, 95% worst case;
 - h. the particulate emissions, in tons per month, (the summation of: ({{["(11)e." x (1-“(11)f.”)] x (1-“11g.”)}}); and
 - i. The rolling, 12-month total PE/PM10 emissions from overspray. The rolling, 12-month summation of the total PE/PM10 emissions (the total amount of PE/PM10 emissions for the current month (“(10)h.”) plus the total amount of PE/PM10 emissions for the 11 previous calendar months).
- (10) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.
- (11) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63, Subpart IIII, this emissions unit shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the coating VOC/OC content 1.0 pounds per gallon of coating, as a monthly volume weighted average, as applied;
 - b. all exceedances of the liquid organic cleanup VOC content 7.25 pounds per gallon;
 - c. when the overspray control system being employed was not in service when the emissions unit was spray applying coatings, as well as, all operations during which the overspray control system was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee;
 - d. identify each day when a fuel other than natural gas was burned in this emissions unit; and
- The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (2) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR 63, Subpart IIII for this emissions unit.



- (3) (3) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63, Subpart IIII, the permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through -63.3131.

f) Testing Requirements

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

- a. Emission Limitation:

3.95 pounds of particulate emissions (PE) per hour from overspray.

The above limitation is based on the following equation:

$$HER = \{[(Cu \times Cd) \times Sc] \times (1-Te)\} \times (1-Ce)$$

Where:

HER = Hourly Emission Rate, in pounds of PE per hour;

Cu = Coating usage, in gallons per hour, (31.0, from PTI application);

Cd = Coating density, in pounds per gallon, (9.8, from MSD sheet);

Sc = Solid content, in percent by weight, (40%, from MSD sheet);

Te = Transfer efficiency, in percent, (at least 35% assumed based on the use high volume Low pressure coating method, from PTI application); and

Ce = Control efficiency, in percent, (at least 95% assumed based on the use of wet or dry scrubber system).

Applicable Compliance Method:

Compliance with the allowable PE from overspray will be assumed based on the maximum potential coating usage of 31.0 gallons per hour. Prior to any modifications that would increase the hourly potential coating usage, this emissions unit will need additional air pollution permit review.

- b. Emission Limitation:

The liquid organic cleanup materials employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section d) of this permit.



c. Emission Limitation:

Emissions from the combustion of natural gas in this emissions unit shall not exceed:

0.02 pounds per hour;

0.01 pounds per hour;

1.0 pounds per hour;

0.84 pounds per hour; and

0.06 pounds per hour.

The above limitations are based on the following equations:

$$\text{HER} = [\text{Btu} / (1000 \text{ btu/cf})] \times \text{Ef}$$

Where:

HER = Hourly emissions rate, in pounds emitted per hour;

Btu = Combined BTU heat input of all three natural gas fired burners associated with this emissions unit, in mmBTU/hr, ((8.0 mmBTU/hr (ASU) + 1.0 mmBTU/hr (Burner #1) + 1.0 mmBTU/hr (Burner #2) = 10 mm BTU/hr combined) from PTI application);

Ef = Emissions factors, in pounds emitted per mmcf, (1.9 PM/PM10, 0.6 SO₂, 100 NO_x, 84 CO, and 5.5 TOC(VOC), from PTI application calculation sheet and AP-42).

Applicable Compliance Method:

Compliance will be assumed based on the use of natural gas and the record keeping in section d) of this permit.

d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).



e. Emission Limitation:

Particulate emissions (PE) emission from the gaseous fuels shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the record keeping in section d) of this permit.

g. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart P, in accordance with 40 CFR 63.4491.

Applicable Compliance Method:

If applicable, see 40 CFR Part 63, Subpart P (40 CFR 63.4480 through 63.4581).

h. Emission Limitation:

The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart III, in accordance with 40 CFR 63.3091.

Applicable Compliance Method:

If applicable, see 40 CFR Part 63, Subpart III (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.



20. Emissions Unit Group - Injection Mold Machines: P025, P026, P027,

EU ID	Operations, Property and/or Equipment Description
P025	Injection Molding Machine
P026	Injection Molding Machine
P027	Injection Molding machine

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) b)(1)d., and d)(2), below.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.
b.	OAC rule 3745-31-32(A)(6)	The Plant-wide Applicability Limitation (PAL) for facility-wide VOC emissions applies to this emissions unit. The PAL for VOC is listed in the facility-wide terms and conditions in B.1. The record keeping requirements in section d) contribute to the calculation of the total VOC emissions from this facility as specified in B.2.
c.	OAC rule 3745-114-01	Toxic Air Contaminant Statute See section d), below.



- (2) Additional Terms and Conditions
 - a. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.
 - b. Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:
 - i. Section b)(1)a.;
 - ii. Section b)(2)a.;
 - iii. Section e)(1); and
 - iv. Section f)(1)a.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information:
 - a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
 - b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
 - c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
 - d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in c)(1). of this permit.
 - (2) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):



Pollutant: Isopropanol

TLV (ug/m3): 491,500

Maximum Hourly Emission Rate (lbs/hr): 13.24

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 944.5

MAGLC (ug/m3): 11,702

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which include the following information:

- a. any modifications that would increase the hourly VOC and/or air toxic emissions above the existing hourly potential.

These deviation reports shall be submitted in accordance with the specific requirements of this permit.

f) Testing Requirements

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

- a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

$$HER = (PP)(PPv)(0.03^*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)$$

Where:

HER = Hourly Emission Rate, in lbs/hr;

PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);

PPv = the VOC content of the plastic pellets, lb VOC/lb material;

MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);

MRv = the VOC content of the mold release, lbs VOC/gal;



MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);

MP_v = the VOC content of the mold protectant, lbs VOC/gal;

MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MC_v = the VOC content of the mold cleaner, lbs VOC/gal;

WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and

WS_v = the VOC content of the wiping solvent, lbs VOC/gal

* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

- (2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

- (1) None.