John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/28/2014

Certified Mail

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

Mr. Jeff Waid
Performance Manufacturing Center
24000 Honda Parkway
Marysville, OH 43040

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010413
Permit Number: P0113356
Permit Type: Administrative Modification
County: Union

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-CDO

Response to Comments

Facility ID:	0180010413
Facility Name:	Performance Manufacturing Center
Facility Description:	Auto Assembly Plant
Facility Address:	25000 Honda Parkway Marysville, OH 43040 Union County
Permit:	P0113356, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Marysville Tribune on 01/16/2014. The comment period ended on 02/15/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

On February 14, 2014, comments were received from Ms. Genevieve Damico of USEPA Region V, Chief, Air Permits Section. The comments and response to comments are provided below.

1. The permit on page 12 established the PALs. In establishing the PAL for Volatile Organic Compounds (VOC), the baseline actual facility-wide VOC emissions for 2004 and 2005 were used. The increase in VOC was stated at 39.9 tons of VOC to keep the increase below the Prevention of Significant Deterioration (PSD) threshold, which resulted in the adjusted baseline actual facility-wide VOC emissions of 2,121.2. It appears that the adjusted baseline of 2,121.2 is an increase of 40.2 tons of VOC, making the project major for PSD. Please provide justification for not considering this project major under PSD.

   On March 17, 2014, Honda provided an updated/corrected PAL for VOC. The PAL for VOC has been changed from 2,121.2 tons per rolling, 12-month period to 2,125.9 tons per rolling, 12-month period. The limit is based upon actual facility-wide VOC emissions from 2004 and 2005 of 2,065.8 and 2,107.9 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,086.9 tons per year. Based on an increase below PSD of 39.0 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,125.9 tons per year on a rolling, 12-month basis.

2. In the requirements listed for K004, starting on page 63 of the permit, several conditions involving use

of the thermal oxidizer for VOC emissions begin with "when operating as an 'automobile or light-duty truck assembly plant.'" This statement suggests that the facility can fluctuate from being an automobile or light-duty truck assembly plant as well as the requirement to use the thermal oxidizer for VOC emissions. Please clarify the status of the facility's operation and the applicable requirements.

The Performance Manufacturing Center (PMC) is a new low volume, specialty automobile plant that will be located in an existing building on Honda's property. The facility anticipates commencing operation as an "automobile or light-duty truck assembly plant" as defined in OAC rule 3745-21-01 later this year. Prior to operation as an "automobile or light-duty truck assembly plant," Honda will use K004 for testing purposes. As such, the permit for K004 contains conditions for these two different operating scenarios.

OAC rule 3745-21-09(U) specifies the requirements for surface coating of miscellaneous metal parts and products. This rule applies to K004 prior to operating as an "automobile or light-duty truck assembly plant" when K004 will be used for testing purposes. K004 is restricted to using no more than 10 gallons of coating per day under OAC rule 3475-21-09(U)(2)(e)(iii). The use of the thermal oxidizer is not required to demonstrate compliance with this requirement.

OAC rule 3745-21-09(C) specifies the requirements for surface coating of automobiles and light-duty trucks. Upon commencing operation as an "automobile or light-duty truck assembly plant," Honda is required to comply with the requirements of OAC rule 3745-21-09(C). It has been determined that use of a thermal oxidizer is necessary to demonstrate compliance with the requirements of OAC rule 3745-21-09(C).

The pre-production testing in K004 will not be used as part of the "automobile or light-duty truck assembly plant" operations. Once Honda begins operating as an "automobile or light-duty assembly plant," the thermal oxidizer will be used during operation of K004 and the requirements of OAC rule 3745-21-09(U) will no longer apply.

3. Throughout section C. of the permit, several typos appear where spaces are missing. Please look over the permit to correct the typos.

Ohio EPA reviewed Section C. of the permit and did not find any typos where spaces are missing. No changes were made to the permit as a result of this comment.

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Performance Manufacturing Center

Facility ID:	0180010413
Permit Number:	P0113356
Permit Type:	Administrative Modification
Issued:	3/28/2014
Effective:	3/28/2014

Division of Air Pollution Control
Permit-to-Install
for
Performance Manufacturing Center

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Authorization

Facility ID:	0180010413
Facility Description:	Auto Assembly Plant
Application Number(s):	A0046954, A0049185
Permit Number:	P0113356
Permit Description:	Administrative modification to establish Plantwide Applicability Limits (PAL) for the major stationary source comprised of the following facilities located on contiguous property in Union and Logan Counties: Marysville Automobile Plant, East Liberty Automobile Plant, Honda North American Engineering, Honda Company Facilities, Honda Performance Manufacturing Center ("Honda S-Line"), and Midwest Express, Inc.
Permit Type:	Administrative Modification
Permit Fee:	$700.00
Issue Date:	3/28/2014
Effective Date:	3/28/2014

This document constitutes issuance to:

Performance Manufacturing Center
25000 Honda Parkway
Marysville, OH 43040

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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0113356
Permit Description: Administrative modification to establish Plantwide Applicability Limits (PAL) for the major stationary source comprised of the following facilities located on contiguous property in Union and Logan Counties: Marysville Automobile Plant, East Liberty Automobile Plant, Honda North American Engineering, Honda Company Facilities, Honda Performance Manufacturing Center ("Honda S-Line"), and Midwest Express, Inc.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Assembly Operations
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Frame Coating Line
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Body Coating Line
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Final Repair/Polish
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	E-coat Line
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	Weld Operations
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Inspection & Repair Sanding
Superseded Permit Number:	P0109869
General Permit Category and Type:	Not Applicable

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, Central District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Central 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 theOhio EPA DAPC, Central District Officein 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, Central 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, Central 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, Central 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 <u>obtained before</u>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 enteredupon completion of construction and prior to start-up.

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

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

   a) B.8.

2. Establishment of Plantwide Applicability Limitations (PALs)

   a) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) volatile organic compound (VOC) emission limitation of 2,125.9 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 VOC emissions from 2004 and 2005 of 2,065.8 and 2,107.9 tons, respectively. Average facility-wide VOC emissions for 2004 and 2005 are 2,086.9 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 39.0 tons of VOC, the adjusted baseline actual facility-wide VOC emissions are 2,125.9 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 236.4 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 2005 and 2006 of 138.9 and 134.0 tons, respectively. Average facility-wide CO emissions for 2005 and 2006 are 136.4 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 236.4 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 203.0 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 2005 and 2006 of 165.2 and 160.9 tons, respectively. Average facility-wide NOx emissions for 2005 and 2006 are 163.1 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 203.0 tons per year on a rolling, 12-month basis.

   d) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) particulate matter (PM) emission limitation of 133.1 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 107.4 and 109.0 tons, respectively. Average facility-wide PM emissions for 2004 and 2005 are 108.2 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 24.9 tons of PM, the adjusted baseline actual facility-wide PM emissions are 133.1 tons per year on a rolling, 12-month basis.

   e) The combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) PM_{10} emission limitation of 93.7 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_{10} emissions from 2004 and 2005 of 78.2 and 79.4 tons, respectively. Average facility-wide PM_{10} emissions for 2004 and 2005 are 78.8 tons per year. Based on an increase below Prevention of Significant Deterioration (PSD) of 14.9 tons of PM_{10},

the adjusted baseline actual facility-wide PM_{10} emissions are 93.7 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 64.4 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 54.2 and 54.8 tons, respectively. Average facility-wide $PM_{2.5}$ emissions for 2004 and 2005 are 54.5 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 64.4 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 42.7 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 2.8 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 42.7 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 264,626 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 191,727 and 187,528 tons, respectively. Average facility-wide GHG emissions for 2005 and 2006 are 189,628 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 264,626 tons per year on a rolling, 12-month basis.

3. Plantwide Applicability Limitations (PALs)

a) <u>Emission Limitation</u>:

Combined facility-wide, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) VOC emissions shall not exceed 2,125.9 tons per year on a rolling, 12-month basis.

<u>Applicable Compliance Method</u>:

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 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. VOC emissions from significant 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 236.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing CO emissions on a rolling, 12-month basis from all emissions units that emit CO 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 significant 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 203.0 tons per year on a 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 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 significant 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 133.1 tons per year on a 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 PM 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 significant 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) PM_{10} emissions shall not exceed 93.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing PM_{10} emissions on a rolling, 12-month basis from all emissions units that emit PM_{10} 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_{10} emissions from significant 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 64.4 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing $PM_{2.5}$ emissions on a rolling, 12-month basis from all emissions units that emit $PM_{2.5}$ 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 significant 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) SOx emissions shall not exceed 42.7 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing SOx emissions on a rolling, 12-month basis from all emissions units that emit SOx 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. SOx emissions from significant 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 264,626 tons per year on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be demonstrated by summing GHG emissions on a rolling, 12-month basis from all emissions units that emit GHGs 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 significant 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 Recordkeeping 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 thefacility, (Premise numbers 0180010193, 0180010197, 0180010199, 0180010413, 0546000117, and 0546000133) for VOC, $PM_{2.5}$, PM_{10}, PM, NO_x, CO, SO_2, and GHG in accordance with OAC rule 3745-31-32(A)(11) (mass balance, CEMS, CPMS, PEMS, and/or emission factors).

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, $PM_{2.5}$, PM_{10}, PM, NO_x, CO, SO_2, 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 Officein accordance with the 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 Central 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.3 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.

i. The results of any modeling performed pursuant to B.8 of these terms and conditions for the new or modified emissions unit.

ii. The BAT determination information required under B.10 of these terms and conditions for the new or modified emissions unit.

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 Ohio EPA, Central District Office theresults of any re-validation test or method conducted pursuant to OAC rule 3745-31-32(A)(11)(i) within three months after completion of such test or method.

6. PAL Compliance Demonstration

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

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

7. PAL Permit Requirements

a) The 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 the Central 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).

c) This permit authorizes projects involving the installation of new emissions units and modification of existing emissions units that do not require an increase in a PAL provided that the new emissions unit or modification of any existing emissions unit(s) will not cause the violation of any applicable air requirement.

(1) 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 Ohio EPA, Central 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 ORC 3704.03(F)(3) and (4) as well as 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 number0180010413 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 (Assembly Operations);
K002 (Frame Coating Line);
K003 (Body Coating Line);
K004 (Final Repair/Polish);
K005 (E-coat Line); and
P001 (Weld Operations).

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) 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 toxic air contaminant 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 toxic air contaminant that was previously 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":

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

f) Documentation of its evaluation and determination that the new installation and/or changed emissions unit satisfies the "Toxic Air Contaminant Statute"; and

g) 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. Best Available Technology (BAT) Limits For an Initial Installation or 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 Plantwide 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, recordkeeping, and reporting requirements for the BAT determination. The monitoring, recordkeeping, and reporting requirements shall be consistent with the monitoring, recordkeeping, 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, recordkeeping, and reporting selected to support the BAT determination.

e) The BAT determination selected by the owner or operator, and its associated monitoring, recordkeeping, 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 plantwide applicability limit from the requirement to be subject to BAT requirements, the requirements outlined in B.9.b) through B.9.d), 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 rule 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 rule 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.9.b).

11. The terms and conditions contained in this permit shall supersede the terms and conditions for premise 0180010413 in Permit to Install (PTI) P0109869 issued 9/6/2012, for emissions units P001 and P002 and PTI P0115548, for emissions units K001, K002, K003, K004 and K005.

12. The following emission units contained in this permit are subject to 40 CFR Part 60, Subpart MM: K002, K003, K004, and K005. The complete NSPS requirements, including the NSPS 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, Central District Office.

13. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart IIII: K001, K002, K003, K004, K005, and P001. 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, Central District Office.

C. Emissions Unit Terms and Conditions

1. K001, Assembly Operations

Operations, Property and/or Equipment Description:

Assembly Operations (Window install operation using glass primer, body primer, and window adhesive; door sealer application; and miscellaneous parts application of adhesives, solvents and lubricants)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(A)(1)(j)	OAC rule 3745-17-11 does not apply to surface coating processes that employ airless spray and bead-type (extrusion) application methods.
b.	OAC rule 3745-21-09(U)(1)(d)	The volatile organic compound (VOC) content of each coating, with the exception of body primer, applied to metal in this emissions unit shall not exceed 3.5 pounds per gallon (lb/gal), excluding water and exempt solvents. See b)(2)a.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	The usage of body primer in the window install operation shall not exceed 10 gallons per day (gal/day).
d.	ORC 3704.03(T)	Total VOC emissions from all coatings, glass and body primers, adhesives, solvents and lubricants employed shall not exceed 1.65 tons per rolling, 12-month period. The requirements established pursuant to this rule also include compliance with OAC rules 3745-21-09(U)(1)(d) and 3745-31-32(A)(6). See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-32(A)(6)	The Plantwide 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.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC emissions from this facility as specified in B.3.
f.	40 CFR 63, Subpart IIII	See b)(2)d.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)e.

(2) Additional Terms and Conditions

a. The coatings employed in this emissions unit are dried at temperatures not exceeding two hundred degrees Fahrenheit.

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

i. Section b)(1)d.;

ii. Section b)(2)c.;

iii. Section d)(1)e., d)(5)g.; and

iv. Section f)(1)b. and f)(1)c.

c. Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

d. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding

primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.

e. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. The name and identification of each coating, glass and body primer, adhesive, solvent and lubricant applied;

b. The VOC content of eachcoating, glass and body primer, adhesive, solvent and lubricant applied;

c. The number of gallons of each coating, glass and body primer, adhesive, solvent and lubricant employed;

d. The total VOC emissions from all coatings, glass and body primers, adhesives, solvents and lubricants employed, in pounds or tons, i.e., (b) x (c); and

e. The rolling, 12-month summation of VOC emissions from all coatings, glass and body primers, adhesives, solvents and lubricants employed, in tons.

(2) VOC emissions from cleanup/purge material usage, associated with K001, K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with the rolling, 12-month VOC emission limitation.

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.

(3) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K001, K002, K003, K004, and K005:

a. the name and identification of each cleanup/purge material;

b. the VOC content of each cleanup/purge material, in pounds per gallon;

c. the number of gallons of each cleanup/purge material employed; and

d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials appliedin emissions units K001, K002, K003, K004, and K005, times each material's VOC content (b).

(4) 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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation:

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 cleanup and purge solventemployed in emissions units K001, K002, K003, K004, and K005, represented in the applicable VOC emission limitation, i.e., (c) x (d).

(5) In order to document the rolling, 12-month VOC emissions from K001, K002, K003, K004, K005, P001 and P002, the permittee shall maintain monthly records of the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month;

b. the total VOC emissions from all cleanup and purge materials employed in K001, K002, K003, K004, and K005, in pounds or tons per month;

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials from K001, K002, K003, K004 and K005, to be credited to the calculations of the VOC emissions, in pounds or tons per month;

d. the total net VOC emissions from all cleanup/purge employed in emissions units K001, K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);

e. the total VOC emissions from all natural gas combustion sources, in pounds or tons per month;

f. the total net VOC emissions from natural gas combustion and all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, P001 and P002, in pounds or tons per month, i.e., (e) + (a) + (b) - (c); and

g. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005 , i.e., (d) + the previous 11 month calculatedtotal VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005.

(6) The permittee shall collect and record the following information each day for body primer employed to metal components and/or parts:

a. the name and identification of each coating employed;

b. the total volume of each coating employed; and

c. the total volume, in gallons, of all coatings employed.

(7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

(1) The permittee shall notify the director (the Central District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons of body primer per day to metal components and/or parts. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

(2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.5 lb VOC/gal excluding water and exempt solvents. The notification shall include a copy of such

record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emissions Limitation:

The VOC content of each coating, with the exception of body primer, shall not exceed 3.5 lb/gal, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limits may be determined through monthly recordkeeping specified in Section d)(1) above. Formulation data from the manufacturer of the coating or U.S. EPA Method 24 shall be used to determine the VOC content.

b. Emissions Limitation:

Total VOC emissions from all coatings, glass and body primers, adhesives, solvents and lubricants employed shall not exceed 1.65 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the recordkeeping requirements specified in Section d)(1). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

c. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(5). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

d. Emissions Limitation:

The usage of body primer in the window install operation shall not exceed 10 gallons per day.

Applicable Compliance Method:

Compliance with this limit may be determined through the recordkeeping specified in Section d)(6) above.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

2. K002, Frame Coating Line

Operations, Property and/or Equipment Description:

Frame Coating including the application of sealers, deadeners, acoustic foam, and blackout with associated air supply units and natural gas-fired 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 operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(A)(1)(j)	OAC rule 3745-17-11 does not apply to surface coating processes that employ airless spray and bead-type (extrusion) application methods.
b.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the topcoat operation. See b)(2)d. through b)(2)f.
c.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of each sealer, deadener, and acoustic foam applied to metal in this emissions unit shall not exceed 3.0 lb/gal, excluding water and exempt solvents.
d.	ORC 3704.03(T)	Total VOC emissions from all sealers, deadeners and topcoat (blackout) coatingsemployed shall not exceed 3.14 tons per rolling, 12-month period. Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed: 1.35 tons of VOC per rolling, 12-month

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		period; 24.53 tons of NOx per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period. The requirements established pursuant to this rule also include compliance with OAC rules 3745-21-09(C)(1)(c), 3745-21-09(U)(1)(i) and 3745-31-32(A)(6). See b)(2)d., b)(2)e., b)(2)f., b)(2)g., b)(2)h. and b)(2)i.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM_{10} emissions from coating overspray shall not exceed 0.19 pound per hour. $PM_{2.5}$ emissions from coating overspray shall not exceed 0.13 pound per hour. Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed: 0.11 pound of PM_{10}/$PM_{2.5}$ per hour; and 0.03 pound of SO_2 per hour. See b)(2)a., b)(2)g. and b)(2)h.
f.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
g.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions apply to this emissions unit. The PALs for VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions from this facility as specified in B.3.
h.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.47 kg/L (12.26 lb/gal) of applied coating solids, as amonthly volume weighted average from the topcoat coating operation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR 63, Subpart IIII	See b)(2)j.
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)k.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. These rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the of PM_{10}, $PM_{2.5}$ and SO_2, emissions from this air contaminant source since the controlled potentials to emit for these pollutants are less than 10 tons per year taking into account the maximum total burner capacity established under ORC 3704.03(T).

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

i. Section b)(1)d. through b)(1)f.;

ii. Section b)(2)a., b)(2)b., b)(2)g. b)(2)h. b)(2)i.;

iii. Section d)(1)e., d)(5)g.; and

iv. Section f)(1)a., f)(1)b., f)(1)c. and f)(1)f.

d. VOC emissions from the topcoat (blackout) booth associated with this emissions unit shall be vented to athermal oxidizer that shall meet the operational, monitoring, and recordkeeping requirements of this permit, when the topcoat (blackout) booth is in operation.

e. The thermal oxidizer controlling the topcoat (blackout) booth shall operate at a minimum VOC removal efficiency of 95%, by weight.

f. VOC emissions from the topcoat (blackout) booth are based on an assumed overall control efficiency (i.e. topcoat (blackout) booth capture efficiency x removal efficiency of thermal oxidizer) of 80% by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted.

g. The natural gas limitations are based on the potentials to emit taking into account a maximum total burner capacity of 56.00 MMBtu/hr. The coating overspray limitation is based on the potential to emit as vented to a particulate filter. The monitoring, recordkeeping and reporting requirements established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

h. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K004, K005, P001, and P002 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 remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

i. Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

j. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

   i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

   ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and

thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.

k. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall operate the thermal oxidizer whenever topcoat (blackout) is being applied in this emissions unit.

(2) The permittee shall burn only natural gas as fuel in this emissions unit.

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect, record, and maintain the following information each month:

a. the name and identification of each sealer, deadener and topcoat (blackout) coating employed;

b. the VOC content of each sealer, deadener and topcoat (blackout) coating employed;

c. the number of gallons of each sealer, deadener and topcoat (blackout) coating employed;

d. the total VOC emissions from all sealers, deadeners and topcoat (blackout) coatings employed, excluding cleanup and purge materials maintained in Section d)(3), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all sealer, deadener and topcoat (blackout) coating applied in this emissions unit times each material's VOC content (b); and

e. the rolling, 12-month total VOC emissions from all sealers, deadeners and topcoat (blackout) coatings, excluding cleanup/purge, employed in emission unit K002, i.e., (d) + the previous 11 month calculated total VOC emissions from sealers, deadeners and topcoat (blackout) coatingsemployed in K002.

(2) VOC emissions from cleanup/purge material usage, associated with K001, K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with the rolling, 12-month VOC emission limitation.

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.

(3) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K001, K002, K003, K004, and K005:

a. the name and identification of each cleanup/purge material;

b. the VOC content of each cleanup/purge material, in pounds per gallon;

c. the number of gallons of each cleanup/purge material employed; and

d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials appliedin emissions units K001, K002, K003, K004, and K005, times each material's VOC content (b).

(4) 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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation:

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 cleanup and purge solventemployed in emissions units K001, K002, K003, K004, and K005, represented in the applicable VOC emission limitation, i.e., (c) x (d).

(5) In order to document the rolling, 12-month VOC emissions from K001, K002, K003, K004, K005, P001 and P002, the permittee shall maintain monthly records of the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month;

b. the total VOC emissions from all cleanup and purge materials employed in K001, K002, K003, K004, and K005, in pounds or tons per month;

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials from K001, K002, K003, K004 and K005, to be credited to the calculations of the VOC emissions, in pounds or tons per month;

d. the total net VOC emissions from all cleanup/purge employed in emissions units K001, K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);

e. the total VOC emissions from all natural gas combustion sources, in pounds or tons per month;

f. the total net VOC emissions from natural gas combustion and all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, P001 and P002, in pounds or tons per month, i.e., (e) + (a) + (b) - (c); and

g. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005 , i.e., (d) + the previous 11 month calculatedtotal VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005.

(6) If demonstrating compliance with the daily pound VOC per gallon deposited solids limitation from 3745-21-09(C)(1)(c), the permittee shall maintain records for the topcoat line in accordance with the U.S. EPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (the Protocol).The Protocol shall be used to determine, calculate, measure, and/or document each of the following factors:

a. the daily usage of each coating;

b. the VOC generated per gallon of each coating;

c. the volume solids content of each coating; and

d. the daily weighted transfer efficiency of each coating applied.

The daily volume-weighted average for each day in a month shall be calculated, usingthe overall control efficiency, as determined for the thermal oxidizer during the most

recent emissions test that demonstrated that the emissions unit was in compliance, recorded, and maintained at the end of each month:

e. asthe daily volume-weighted average of VOC per gallon of deposited solids for the for the application of topcoats.

(7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance.Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

(9) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.

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

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(13) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the topcoat (blackout) booth was in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in “a”or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a”or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

e. each incident of deviation described in “a”or “b” where proper records were not maintained for the investigation and/or the corrective action(s);

f. each day when a fuel other than natural gas was burned in this emissions unit; and

g. anyexceedance of the 1.47 kg VOC/L(12.26 lb VOC/gal) applied solids, as a monthly volume-weighted average limitation (satisfies the reporting requirements of 40 CFR Part 60.396(b) for NSPS emission limitation deviations).

(2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.0 lb VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(3) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content of coatings exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

(7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emissions Limitation:

Total VOC emissions from all sealers, deadeners and topcoat (blackout) coatings employed shall not exceed 3.14 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(1). Formulation data from the manufacturer of the coating or U.S. EPA Method 24 shall be used to determine the VOC content.

b. Emissions Limitation:

Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed:

1.35 tons of VOC per rolling, 12-month period;
24.53 tons of NOx per rolling, 12-month period;
20.60 tons of CO per rolling, 12-month period;
0.11 pound of $PM_{10}/PM_{2.5}$ per hour; and
0.03 pound of SO_2 per hour.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25 or 25A for VOC, Methods 1-4 and 7E for NO_x, Method 10 for CO, and Method 6C for SO_2as well as 40 CFR Part 51, Appendix M, Method 201A for $PM_{10}/PM_{2.5}$. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emissions Limitation:

PM_{10} emissions from coating overspray shall not exceed 0.19 pound per hour.

$PM_{2.5}$ emissions from coating overspray shall not exceed 0.13 pound per hour.

Applicable Compliance Method:

To determine the worst case emissions rate, in pounds, the following equation shall be used:

$PM_{10}/PM_{2.5}$ = (Coating) x (Units) x (Density) x (Solids) x (1 – TE) x (1 – CE), where:

Coating = Maximum amount of coating employed per unit (gal)
Units = Maximum number of units processed per hour
Density = Density of coating (lb/gal)
Solids = Solids content of coating (% wt)
TE = transfer efficiency
CE = filter efficiency

If required, the permittee shall demonstrate compliance with the hourly emissions limitations through an emission test performed in accordance with 40 CFR Part 52, Appendix M, Method 201A.

d. Emission Limitation:

VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the topcoat operation.

Applicable Compliance Method:

Compliance with the VOC limitation may be determined through daily recordkeeping specified in Section d)(6).

e. Emission Limitation:

The VOC content of each sealer, deadener, and acoustic foam applied to metal in this emissions unit shall not exceed 3.0 lb/gal, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(1). Formulation data from the manufacturer of the coating or U.S. EPA Method 24 shall be used to determine the VOC content.

f. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(5). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

g. Emissions Limitation:

The thermal oxidizer controlling the topcoat (blackout) booth shall operate at a minimum VOC removal efficiency of 95%, by weight.

Applicable Compliance Method:

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

i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

ii. Emission testing shall be conducted as least once every five years.

iii. The emission testing shall be conducted to determine the VOC control efficiency of the thermal oxidizer controlling the topcoat (blackout) booth. The permittee shall also determine the capture efficiency for the topcoat (blackout) booth.

iv. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Methods 1-4, 25 or 25A, as appropriate.

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

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of

the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. 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,Central 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, Central District Office's refusal to accept the results of the emission test(s).

vii. Personnel from the Ohio EPA, Central 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.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central 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, Central District Office.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

3. K003, Body Coating Line

Operations, Property and/or Equipment Description:

Body Coating Line including a primer/clearcoat booth, a clearcoat booth, and a bake oven. Also includes two online repair booths.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	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.
b.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/MMBtu of actual heat input. The PE limitation required pursuant to this rule is less stringent than the limitation for natural gas combustion established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11(C)	See c)(1) and c)(2)
d.	OAC rule 3745-21-09(C)(1)(a)(v)	VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the guidecoat/surfacer operation. See b)(2)d. through b)(2)g.
e.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the topcoat operation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)e. through b)(2)g.
f.	ORC 3704.03(T)	Total VOC emissions from all coatings shall not exceed 15.05 tons per rolling, 12-month period. Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 shall not exceed: 1.35 tons of VOC per rolling, 12-month period; 24.53 tons of NOx per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period. The requirements of this rule also includecompliance with the requirements of OAC rules 3745-21-09(C)(1)(a)(v), 3745-21-09(C)(1)(c), 3745-31-32(A)(6) and 40 CFR Part 60, Subpart MM. See b)(2)a., b)(2)c., b)(2)e., b)(2)f., b)(2)g., and b)(2)j.
g.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM_{10} emissions from coating overspray shall not exceed 1.09 pounds per hour. $PM_{2.5}$ emissions from coating overspray shall not exceed 0.74 pound per hour. Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed: 0.11 pound of PM_{10}/$PM_{2.5}$ per hour; and 0.03 pound of SO_2 per hour. See b)(2)a., b)(2)h. and b)(2)j.
h.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)i.
i.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions apply to this emissions unit. The PALs for VOC, NO_x, CO, SO_2, GHG,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM, PM_{10},and $PM_{2.5}$ are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions from this facility as specified in B.3.
j.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 kilograms per liter (kg/L) (11.68 lb/gal) of applied coating solids, as amonthly volume weighted average from the guidecoat coating operation. VOC emissions shall not exceed 1.47 kg/L (12.26 lb/gal) of applied coating solids, as amonthly volume weighted average from the topcoat coating operation.
k.	40 CFR Part 63, Subpart IIII	See b)(2)k.
l.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)l.

(2) Additional Terms and Conditions

a. The natural gas limitations are based on the potentials to emit taking into account a maximum total burner capacity of 56.00 MMBtu/hr. The coating overspray limitation is based on the potential to emit as vented to a particulate filter. The monitoring, recordkeeping and reporting requirements established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

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

i. Section b)(1)f. through b)(1)h.;

ii. Section b)(2)a., b)(2)c., b)(2)h. b)(2)i. b)(2)j.;

iii. Section d)(7)f., d)(11)g.; and

iv. Section f)(1)e. through f)(1)h.

c. Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

d. The primer/surfacer operation is regulated as a "surfacer" in accordance with the definition found in OAC rule 3745-21-01(C)(57). The definition states "surfacer means a surface coating applied to the body of an automobile or light-duty truck between the electrodeposition prime coat and the topcoat." The primer/surfacer is applied after the electrodeposition prime coat operation (K005) and before the topcoat operation.

e. VOC emissions from the primer/clearcoat booth, basecoat booth, and their associated online repair booths shall be vented to athermal oxidizer that shall meet the operational, monitoring, and recordkeeping requirements of this permit, when the emissions unit is in operation.

f. The thermal oxidizer controlling the primer/clearcoat booth, basecoat booth, and their associated online repair booths shall operate at a minimum VOC removal efficiency of 95%, by weight.

g. VOC emissions are based on an assumed overall control efficiency (i.e. primer/clearcoat, basecoat and associated online repair booth capture efficiency x removal efficiency of thermal oxidizer) of 80% by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted.

h. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

i. These rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

   i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the of PM_{10}, $PM_{2.5}$ and SO_2, emissions from this air contaminant source since the controlled potentials to emit for these pollutants are less than 10 tons per year taking into account the maximum total burner capacity established under ORC 3704.03(T).

j. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K004, K005, P001, and P002 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 remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

k. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.

l. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever coating is being sprayed in this emissions unit and shall maintain

the dry particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee shall operate the thermal oxidizer whenever this emissions unit is in operation.

(4) The permittee shall burn only natural gas as fuel in this emissions unit.

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(6) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(7) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter 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.

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

a. the date of the inspection;

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

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

d. the name of person who performed the inspection.

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

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

(6) If demonstrating compliance with the daily pound VOC per gallon deposited solids limitation from OAC rule 3745-21-09(C)(1)(a)(v) and 3745-21-09(C)(1)(c), the permittee shall maintain records for the guidecoat/primer coating line and topcoat line in accordance with the U.S. EPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (the Protocol).The Protocol shall be used to determine, calculate, measure, and/or document each of the following factors:

a. the daily usage of each coating;

b. the VOC generated per gallon of each coating;

c. the volume solids content of each coating; and

d. the daily weighted transfer efficiency of each coating applied.

The daily volume-weighted average for each day in a month shall be calculated, usingthe overall control efficiency, as determined for the thermal oxidizer during the most recent emissions test that demonstrated that the emissions unit was in compliance, recorded, and maintained at the end of each month:

e. as the daily volume-weighted average of VOC per gallon of deposited solids for the application of guidecoats/surfacers; and

f. asthe daily volume-weighted average of VOC per gallon of deposited solids for the for the application of topcoats.

(7) The permittee shall collect and record the following information each month:

a. the name and identification of each coating employed;

b. the VOC content of each coating employed;

c. the number of gallons of each coating employed;

d. the total uncontrolled VOC emissions from all coatings employed, excluding cleanup and purge materials maintained in Section d)(9), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all coatings, applied in this emissions unit times each material's VOC content (b);

e. the total controlled VOC emission rate from K003 for all coatings (excluding cleanup/purge) employed, calculated using the most recent capture and destruction efficiency test results for the booth and the adsorber, in pounds per month, i.e., [(d) x (100% - capture efficiency) x (100% - destruction efficiency)]; and

f. the rolling, 12-month total VOC emissions from all coatings, excluding cleanup/purge, employed in emission unit K003, i.e., (d) + the previous 11 month calculated total VOC emissions from coatingsemployed in K003.

(8) VOC emissions from cleanup/purge material usage, associated with K001, K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with the rolling, 12-month VOC emission limitation.

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.

(9) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K001, K002, K003, K004, and K005:

a. the name and identification of each cleanup/purge material;

b. the VOC content of each cleanup/purge material, in pounds per gallon;

c. the number of gallons of each cleanup/purge material employed; and

d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials appliedin emissions units K001, K002, K003, K004, and K005, times each material's VOC content (b).

(10) 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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation:

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 cleanup and purge solventemployed in emissions units K001, K002, K003, K004, and K005, represented in the applicable VOC emission limitation, i.e., (c) x (d).

(11) In order to document the rolling, 12-month VOC emissions from K001, K002, K003, K004, K005, P001 and P002, the permittee shall maintain monthly records of the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month;

b. the total VOC emissions from all cleanup and purge materials employed in K001, K002, K003, K004, and K005, in pounds or tons per month;

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials from K001, K002, K003, K004 and K005, to be credited to the calculations of the VOC emissions, in pounds or tons per month;

d. the total net VOC emissions from all cleanup/purge employed in emissions units K001, K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);

e. the total VOC emissions from all natural gas combustion sources, in pounds or tons per month;

f. the total net VOC emissions from natural gas combustion and all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, P001 and P002, in pounds or tons per month, i.e., (e) + (a) + (b) - (c); and

g. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005 , i.e., (d) + the previous 11 month calculatedtotal VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005.

(12) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(13) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance.Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

(14) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.

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

(16) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(17) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(18) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in “a”or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a”or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

e. each incident of deviation described in “a”or “b” where proper records were not maintained for the investigation and/or the corrective action(s);

f. any exceedance of the 1.40 kg VOC/L(11.68 lb VOC/gal) applied solids or 1.47 kg VOC/L(12.26 lb VOC/gal) applied solids, as a monthly volume-weighted average limitations (satisfies the reporting requirements of 40 CFR Part 60.396(b) for NSPS emission limitation deviations);

g. each day when a fuel other than natural gas was burned in this emissions unit; and

h. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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 Ohio EPA, Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content of coatings exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

(6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

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 with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance is inherent based on the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.010 lb/MMBtu (7.6 lb of total PM/million standard cubic feet divided by 1020 MMBtu /million standard cubic feet).

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 and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the guidecoat/surfacer operation.

Applicable Compliance Method:

Compliance with the VOC limitation may be determined through daily recordkeeping specified in Section d)(6) above.

d. Emission Limitation:

VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the topcoat operation.

Applicable Compliance Method:

Compliance with the VOC limitation may be determined through daily recordkeeping specified in Section d)(6) above.

e. Emissions Limitation:

Total VOC emissions from all coatings shall not exceed 15.05 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(7). Formulation data from the manufacturer of the coating or U.S. EPA Method 24 shall be used to determine the VOC content.

f. Emissions Limitation:

Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed:

1.35 tons of VOC per rolling, 12-month period;
24.53 tons of NOx per rolling, 12-month period;
20.60 tons of CO per rolling, 12-month period;
0.11 pound of PM_{10}/$PM_{2.5}$ per hour; and
0.03 pound of SO_2 per hour.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25 or 25A for VOC, Methods 1-4 and 7E for NO_x, Method 10 for CO, and Method 6C for SO_2as well as 40 CFR Part 51, Appendix M, Method 201A for PM_{10}/$PM_{2.5}$. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emissions Limitation:

PM_{10} emissions from coating overspray shall not exceed 1.09 pounds per hour.

$PM_{2.5}$ emissions from coating overspray shall not exceed 0.74 pound per hour.

Applicable Compliance Method:

To determine the worst case emissions rate, in pounds, the following equation shall be used:

$PM_{10}/PM_{2.5}$ = (Coating) x (Units) x (Density) x (Solids) x (1 – TE) x (1 – CE), where:

Coating = Maximum amount of coating employed per unit (gal)
Units = Maximum number of units processed per hour
Density = Density of coating (lb/gal)
Solids = Solids content of coating (% wt)
TE = transfer efficiency
CE = filter efficiency

If required, the permittee shall demonstrate compliance with the hourly emissions limitations through an emission test performed in accordance with 40 CFR Part 52, Appendix M, Method 201A.

h. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(11). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

i. Emissions Limitation:

The thermal oxidizer controlling the primer/clearcoat booth, basecoat booth, and their associated online repair booths shall operate at a minimum VOC removal efficiency of 95%, by weight.

Applicable Compliance Method:

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

i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

ii. Emission testing shall be conducted as least once every five years.

iii. The emission testing shall be conducted to determine the VOC control efficiency of the thermal oxidizer controlling the primer/clearcoat booth, basecoat booth, and their associated online repair booths. The permittee shall also determine the capture efficiency for the primer/clearcoat booth, basecoat booth, and their associated online repair booths.

iv. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Methods 1-4, 25 or 25A, as appropriate.

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

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. 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,Central 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, Central District Office's refusal to accept the results of the emission test(s).

vii. Personnel from the Ohio EPA, Central 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.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central 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, Central District Office.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

4. K004, Final Repair/Polish

Operations, Property and/or Equipment Description:

Coating booth for production part coating, off-line repair coating and final repair coating of finished vehicles and associated oven.Includes inspection and polish area.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(A)(1)(k)	OAC rule 3745-17-11 does not apply to surface coating processes that employ hand-held cup spray guns.
b.	OAC rule 3745-21-09(C)(1)(a)(v)	VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the guidecoat/surfacer operation. See b)(2)b. through b)(2)d.
c.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the topcoat operation. See b)(2)b. through b)(2)d.
d.	OAC rule 3745-21-09(C)(1)(d)	VOC emissions from coatings in the final repair operations shall not exceed 13.8 pounds per gallon of solids, as a daily volume-weighted average. See b)(2)b. through b)(2)d.
e.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	ORC 3704.03(T)	Total VOC emissions from all coatings and non-coating materials (polish and other repair materials) shall not exceed 2.34tons per rolling, 12-month period. Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 shall not exceed: 1.35 tons of VOC per rolling, 12-month period; 24.53 tons of NOx per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period. The requirements established pursuant to this rule also include compliance with the requirements of OAC rules 3745-21-09(C) when operating as an "automobile or light-duty truck assembly plant" and 3745-31-32(A)(6). See b)(2)b., b)(2)c., b)(2)d., b)(2)e., b)(2)h. and b)(2)j.
g.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PM_{10} emissions from coating overspray shall not exceed 0.25 pounds per hour. $PM_{2.5}$ emissions from coating overspray shall not exceed 0.17 pound per hour. Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed: 0.11 pound of $PM_{10}/PM_{2.5}$ per hour; 0.47 ton of $PM_{10}/PM_{2.5}$ per year; 0.03 pound of SO_2 per hour; and 0.15 ton of SO_2 per year. See b)(2)e., b)(2)f. and b)(2)h.
h.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)g.
i.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$emissions

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		apply to this emissions unit. The PALs for VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions from this facility as specified in B.3.
j.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 kilograms per liter (kg/L) (11.68 lb/gal) of applied coating solids, as amonthly volume weighted average from the guidecoat coating operation. VOC emissions shall not exceed 1.47 kg/L (12.26 lb/gal) of applied coating solids, as amonthly volume weighted average from the topcoat coating operation.
k.	40 CFR 63, Subpart IIII	See b)(2)k.
l.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)l.

(2) Additional Terms and Conditions

a. Prior to operating as an “automobile or light-duty truck assembly plant” as defined in OAC rule 3745-21-01, the permittee shall not use more than 10 gallons of coating material per day.

b. When operating as an “automobile or light-duty truck assembly plant,” as defined in OAC rule 3745-21-01, the VOC emissions from the off-line coating repair booth shall be vented to athermal oxidizer that shall meet the operational, monitoring, and recordkeeping requirements of this permit, when the emissions unit is in operation.

c. The thermal oxidizer controlling the off-line coating booth shall operate at a minimum VOC removal efficiency of 95%, by weight.

d. VOC emissions are based on an assumed overall control efficiency (i.e. off-line coating booth capture efficiency x removal efficiency of thermal oxidizer) of 80% by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted.

e. The natural gas limitations are based on the potentials to emit taking into account a maximum total burner capacity of 56.00 MMBtu/hr. The coating overspray

limitation is based on the potential to emit as vented to a particulate filter. The monitoring, recordkeeping and reporting requirements established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

g. This rule 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.

   i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the of PM_{10}, $PM_{2.5}$ and SO_2, emissions from this air contaminant source since the controlled potentials to emit for these pollutants are less than 10 tons per year taking into account the maximum total burner capacity established under ORC 3704.03(T).

h. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K004, K005, P001, and P002 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 remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

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

   i. Section b)(1)f. through b)(1)h.;

   ii. Section b)(2)e., b)(2)f., b)(2)g., b)(2)h., b)(2)j.;

   iii. Section d)(4)e., d)(8)g.; and

   iv. Section f)(1)e. through f)(1)h.

j. Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

k. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.

l. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) When operating as an “automobile or light-duty truck assembly plant,” the permittee shall operate the thermal oxidizer whenever spray coating is being applied in this emissions unit.

(2) The permittee shall burn only natural gas as fuel in this emissions unit.

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) Prior to operating as an “automobile or light-duty truck assembly plant,” the permittee shall collect and record the following information each day:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all of the coatings employed.

The coating usage records shall be maintained for a minimum of 3 years.

(2) If demonstrating compliance with the daily pound VOC per gallon deposited solids limitation from OAC rule 3745-21-09(C)(1)(a)(v) and 3745-21-09(C)(1)(c), the permittee shall maintain records for the guidecoat/primer coating line and topcoat line in accordance with the U.S. EPA publication entitled "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (the Protocol).The Protocol shall be used to determine, calculate, measure, and/or document each of the following factors:

a. the daily usage of each coating;

b. the VOC generated per gallon of each coating;

c. the volume solids content of each coating; and

d. the daily weighted transfer efficiency of each coating applied.

The daily volume-weighted average for each day in a month shall be calculated, usingthe overall control efficiency, as determined for the thermal oxidizer during the most recent emissions test that demonstrated that the emissions unit was in compliance, recorded, and maintained at the end of each month:

e. as the daily volume-weighted average of VOC per gallon of deposited solids for the application of guidecoats/surfacers; and

f. asthe daily volume-weighted average of VOC per gallon of deposited solids for the for the application of topcoats.

(3) When operating as an “automobile or light-duty truck assembly plant,” the permittee shall collect and record the following information each day for coatings used in the final repair operations:

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

b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,3}$.

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

a. the name and identification of each coating, reducing solvent, non-coating material (polish and other repair material) and other material employed;

b. the VOC content of each coating, reducing solvent, non-coating material (polish and other repair material) and other material employed;

c. the number of gallons of each coating, reducing solvents, non-coating materials and other materials employed;

d. the total VOC emissions from all coatings, reducing solvents, non-coating materials and other materials employed, excluding cleanup and purge materials maintained in Section d)(6), in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all coatings, reducing solvents, non-coating materials and other materials applied in this emissions unit times each material's VOC content (b); and

e. the rolling, 12-month total VOC emissions from all coatings, reducing solvents, or other materials, excluding cleanup and purge, employed in emission unit K004, i.e., (d) + the previous 11 month calculated total VOC emissions from coatings, reducing solvents, non-coating materials and other materials employed in K004.

(5) VOC emissions from cleanup/purge material usage, associated with K001, K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with the rolling, 12-month VOC emission limitation.

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.

(6) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K001, K002, K003, K004, and K005:

a. the name and identification of each cleanup/purge material;

b. the VOC content of each cleanup/purge material, in pounds per gallon;

c. the number of gallons of each cleanup/purge material employed; and

d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation

of the products of the amounts (c) of all cleanup materials and purge materials appliedin emissions units K001, K002, K003, K004, and K005, times each material's VOC content (b).

(7) 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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation:

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 cleanup and purge solventemployed in emissions units K001, K002, K003, K004, and K005, represented in the applicable VOC emission limitation, i.e., (c) x (d).

(8) In order to document the rolling, 12-month VOC emissions from K001, K002, K003, K004, K005, P001 and P002, the permittee shall maintain monthly records of the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month;

b. the total VOC emissions from all cleanup and purge materials employed in K001, K002, K003, K004, and K005, in pounds or tons per month;

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials from K001, K002, K003, K004 and K005, to be credited to the calculations of the VOC emissions, in pounds or tons per month;

d. the total net VOC emissions from all cleanup/purge employed in emissions units K001, K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);

e. the total VOC emissions from all natural gas combustion sources, in pounds or tons per month;

f. the total net VOC emissions from natural gas combustion and all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, P001 and P002, in pounds or tons per month, i.e., (e) + (a) + (b) - (c); and

g. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005 , i.e., (d) + the previous 11 month calculatedtotal VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005.

(9) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(10) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance.Following compliance testing, the permittee shall collect and record the following information each daythe thermal oxidizer is required to demonstrate compliancewith the VOC limitation contained in this permit:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

(11) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.

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

(13) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(14) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(15) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

(1) The permittee shall notify the director (the Central District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day prior to operating as an "automobile or light-duty truck assembly plant." The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

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

a. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the off-line coating booth was in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in "a"or "b" (above) where a prompt investigation was not conducted;

d. each incident of deviation described in "a"or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

e. each incident of deviation described in "a"or "b" where proper records were not maintained for the investigation and/or the corrective action(s);

f. each day when a fuel other than natural gas was burned in this emissions unit; and

g. any exceedance of the 1.40 kg VOC/L (11.68 lb VOC/gal) applied solids or 1.47 kg VOC/L (12.26 lb VOC/gal) applied solids, as a monthly volume-weighted average limitations (satisfies the reporting requirements of 40 CFR Part 60.396(b) for NSPS emission limitation deviations).

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

(3) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content of coatings exceeded the applicable limitation in b)(1)b. or b)(1)c. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(4) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the daily volume-weighted average VOC content of coatings

exceeded the applicable limitation in b)(1)d. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(7) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

(8) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the guidecoat/surfacer operation.

Applicable Compliance Method:

Compliance with the VOC limitation may be determined through daily recordkeeping specified in Section d)(2).

b. Emission Limitation:

VOC emissions shall not exceed 2.8 lb VOC/gal of coating, excluding water and exempt solvents, or 15.1 lb VOC/gal of deposited solids, as a daily volume weighted average from the topcoat operation.

Applicable Compliance Method:

Compliance with the VOC limitation may be determined through daily recordkeeping specified in Section d)(2).

c. Emission Limitation:

Prior to operating as an “automobile or light-duty truck assembly plant” as defined in OAC rule 3745-21-01, the permittee shall not use more than 10 gallons of coating material per day.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(1).

d. Emission Limitation:

VOC emissions from coatings in the final repair operations shall not exceed 13.8 pounds per gallon of solids, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance with the coating VOC limit shall be determined through daily recordkeeping of the VOC content of each coating and material used less water and exempt solvents as specified in Section d)(3). Formulation data from each material's manufacturer or U.S. EPA Method 24 shall be used to determine the VOC content of the materials. The daily volume-weighted average VOC content of all materials, as applied, shall be calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,3}$.

e. Emissions Limitation:

Total VOC emissions from all coatings and non-coating materials (polish and other repair materials) shall not exceed 2.34 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(4). Formulation data from the manufacturer of the coating or U.S. EPA Method 24 shall be used to determine the VOC content.

f. Emissions Limitation:

Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed:

1.35 tons of VOC per rolling, 12-month period;
24.53 tons of NOx per rolling, 12-month period;
20.60 tons of CO per rolling, 12-month period;
0.11 pound of $PM_{10}/PM_{2.5}$ per hour; and
0.03 pound of SO_2 per hour.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25 or 25A for VOC, Methods 1-4 and 7E for NO_x, Method 10 for CO, and Method 6C for SO_2as well as 40 CFR Part 51, Appendix M, Method 201A for $PM_{10}/PM_{2.5}$. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emissions Limitation:

PM_{10} emissions from coating overspray shall not exceed 0.25 pound per hour.

$PM_{2.5}$ emissions from coating overspray shall not exceed 0.17 pound per hour.

Applicable Compliance Method:

To determine the worst case emissions rate, in pounds, the following equation shall be used:

$PM_{10}/PM_{2.5}$ = (Coating) x (Units) x (Density) x (Solids) x (1 – TE) x (1 – CE), where:

Coating = Maximum amount of coating employed per unit (gal)
Units = Maximum number of units processed per hour
Density = Density of coating (lb/gal)
Solids = Solids content of coating (% wt)
TE = transfer efficiency
CE = filter efficiency

If required, the permittee shall demonstrate compliance with the hourly emissions limitations through an emission test performed in accordance with 40 CFR Part 52, Appendix M, Method 201A.

h. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(8). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials.

i. Emissions Limitation:

The thermal oxidizer controlling the off-line coating booth shall operate at a minimum VOC removal efficiency of 95%, by weight.

Applicable Compliance Method:

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

i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit as part of an "automobile or light-duty truck assembly plant".

ii. Emission testing shall be conducted as least once every five years.

iii. The emission testing shall be conducted to determine the VOC control efficiency of the thermal oxidizer controlling the off-line coating booth. The permittee shall also determine the capture efficiency for the off-line coating booth.

iv. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Methods 1-4, 25 or 25A, as appropriate.

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

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. 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,Central 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, Central District Office's refusal to accept the results of the emission test(s).

vii. Personnel from the Ohio EPA, Central 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.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central 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, Central District Office.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

5. K005, E-coat Line

Operations, Property and/or Equipment Description:

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	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.
b.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/MMBtu of actual heat input. The PE limitation required pursuant to this rule is less stringent than the limitation for natural gas combustion established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-21-09(C)(1)(a)	See b)(2)l. below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T).
d.	ORC 3704.03(T)	VOC emissions shall not exceed 1.12 pounds per gallon of coating, as applied, excluding water and exempt solvents (free solvent). Total VOC emissions (free solvent + cure solvent) from K005, excluding emissions from natural gas combustion and cleanup and purge, shall not exceed 1.32 tons per rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed: 1.35 tons of VOC per rolling, 12-month period; 24.53 tons of NOx per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6). See b)(2)a., b)(2)b.,b(2)d., b)(2)e., b)(2)f., b)(2)g., b)(2)h. and b)(2)k.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed: 0.11 pound of PM_{10}/$PM_{2.5}$ per hour; and 0.03 pound of SO_2 per hour. See b)(2)b., b)(2)h., and b)(2)i.
f.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)j.
g.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions apply to this emissions unit. The PALs for VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions from this facility as specified in B.3.
h.	NSPS - 40 CFR Part 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-21-09(C)(1)(a) and ORC 3704.03(T).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	40 CFR 63, Subpart IIII	See b)(2)m.
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)n.

(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 frames and body panels are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal oxidizer. 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. The emissions limitations from natural gas combustion for this emissions unit were established to reflect the potentials to emit taking into account a maximum total burner capacity of 56.00 MMBtu/hr. The monitoring and/or recordkeeping requirements established in the following terms and conditions are sufficient to ensure compliance with these limitations.

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

i. Section b)(1)d. through b)(1)f.;

ii. Section b)(2)b., b)(2)d., b)(2)h. through b)(2)k.;

iii. Section d)(1)k., d)(5)g.;

iv. Section e)(1)g.; and

v. Section f)(1)c., f)(1)e., f)(1)f. and f)(1)g.

d. 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 x $350^{(0.160-RT)}$ lb/gas, as a monthly volume-weighted average; and

(b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 x $350^{(0.160-RT)}$ 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 (lb/gallon of applied solids) is applicable.

*R_T is calculated in accordance with OAC rule 3475-21-09(C)(1)(a)(ii).

e. VOC emissions from the E-Coat oven shall be vented to athermal oxidizer that shall meet the operational, monitoring, and recordkeeping requirements of this permit, when the emissions unit is in operation.

f. The thermal oxidizer controlling the E-Coat oven shall operate at a minimum VOC removal efficiency of 95%, by weight.

g. VOC emissions are based on an assumed overall control efficiency (i.e. E-Coat oven capture efficiency x removal efficiency of thermal oxidizer) of 80% by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted.

h. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K004, K005, P001, and P002 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 remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

i. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

j. This rule 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.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the of PM_{10}, $PM_{2.5}$ and SO_2, emissions from this air contaminant source since the potentials to emit for these pollutants are less than 10 tons per year taking into accountthe maximum total burner capacity established under ORC 3704.03(T).

k. Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

l. 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 × 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.

m. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding

systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

iv. Average organic HAP emissions from all deadener materials are limited to no more than 0.010 lb/lb of deadener material used during each month.

n. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall operate the thermal oxidizer whenever the E-Coat oven is processing units.

(2) The permittee shall burn only natural gas as fuel in this emissions unit.

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and maintain monthly records for K005 which contain the following information for materials added to the E-Coat line for the purpose of determining the contribution of coatings and solvent employed in this emissions unit,

excluding cleanup and purge materials, to determine compliance with the rolling, 12-month VOC emission limitation and compliance with the pound of VOC/gas limitation:

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 solvents employed, (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 controlled 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 oxidizer control efficiency)]);

k. the rolling, 12-month total controlled VOC emissions from all coatings (excluding cleanup/purge) employed, i.e., (j) + the previous 11 month calculated total controlled VOC emissions from coatings employed in K005;

l. the total monthly volume-weighted average VOC emissions (free solvent + cure volatiles), in pounds per gallon of applied solids ("j" / "f");

m. 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 (i.e., the total liquid volume contained in the e-coat system's tanks, pumps, recirculation lines, filters, etc. at the system's designed liquid operating level), in gallons; and

n. the calculated VOC emission limitation according to the calculation in b)(2)d.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.

Cure Volatiles = Total VOC – Free Solvent.

(2) VOC emissions from cleanup/purge material usage, associated with K001, K002, K003, K004, and K005, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with the rolling, 12-month VOC emission limitation.

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.

(3) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units K001, K002, K003, K004, and K005:

a. the name and identification of each cleanup/purge material;

b. the VOC content of each cleanup/purge material, in pounds per gallon;

c. the number of gallons of each cleanup/purge material employed; and

d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials appliedin emissions units K001, K002, K003, K004, and K005, times each material's VOC content (b).

(4) 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 covered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation:

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 cleanup and purge solventemployed in emissions units K001, K002, K003, K004, and K005, represented in the applicable VOC emission limitation, i.e., (c) x (d).

(5) In order to document the rolling, 12-month VOC emissions from K001, K002, K003, K004, K005, P001 and P002, the permittee shall maintain monthly records of the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005 and P001, in pounds or tons per month;

b. the total VOC emissions from all cleanup and purge materials employed in K001, K002, K003, K004, and K005, in pounds or tons per month;

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials from K001, K002, K003, K004 and K005, to be credited to the calculations of the VOC emissions, in pounds or tons per month;

d. the total net VOC emissions from all cleanup/purge employed in emissions units K001, K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);

e. the total VOC emissions from all natural gas combustion sources, in pounds or tons per month;

f. the total net VOC emissions from natural gas combustion and all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, P001 and P002, in pounds or tons per month, i.e., (e) + (a) + (b) - (c); and

g. the rolling, 12-month total VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005 , i.e., (d) + the previous 11 month calculatedtotal VOC emissions from cleanup/purge employed in emissions units K001, K002, K003, K004, and K005.

(6) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(7) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance.Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

(8) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.

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

(10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in “a”or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a”or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

e. each incident of deviation described in “a”or “b” where proper records were not maintained for the investigation and/or the corrective action(s);

f. each day when a fuel other than natural gas was burned in this emissions unit;

g. any exceedance of the 1.12 lb VOC/gallon, as applied, limitation, excluding water and exempt solvents (free solvent);

h. any exceedance of the applicable free solvent VOC emission rate, in pounds per gallon of applied solids, specified in b)(2) above; and

i. anyexceedance of the applicable total VOC emission rate, in pounds per gallon of applied solids, specified in b)(2) above.

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 reporting requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

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.

<u>Applicable Compliance Method</u>:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9.

b. <u>Emission Limitations</u>:

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/gasor 1.4 lb/gas, as applicable, 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 $0.7 \times 350^{(0.160- RT)}$ 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 or $1.4 \times 350^{(0.160- RT)}$ lb/gas, as applicable, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance with these emission limitations shall be determined through the monthly recordkeeping requirements, as specified in d)(1).

c. Emission Limitations:

VOC emissions shall not exceed 1.12 pounds per 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 recordkeeping as specified in d)(1). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-Coat mix in the electrodeposition 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.

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance is inherent based on the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.010 lb/MMBtu (7.6 lb of total PM per million standard cubic feet divided by 1,020 MMBtu per million standard cubic feet).

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 and the procedures specified in OAC rule 3745-17-03(B)(10).

e. Emissions Limitation:

Total VOC emissions (free solvent + cure solvent) from K005, excluding emissions from natural gas combustion and cleanup and purge, shall not exceed 1.32 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping in Section d)(1). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the 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.

f. Emissions Limitation:

Emissions from natural gas combustion in emissions units K002, K003, K004, K005, P001 and P002 combined shall not exceed:

1.35 tons of VOC per rolling, 12-month period;
24.53 tons of NOx per rolling, 12-month period;
20.60 tons of CO per rolling, 12-month period;
0.11 pound of $PM_{10}/PM_{2.5}$ per hour; and
0.03 pound of SO_2 per hour.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 25 or 25A for VOC, Methods 1-4 and 7E for NO_x, Method 10 for CO, and Method 6C for SO_2as well as 40 CFR Part 51, Appendix M, Method 201A for $PM_{10}/PM_{2.5}$. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

g. Emissions Limitation:

Total VOC emissions from cleanup and purge solvent from emissions units K001, K002, K003, K004, and K005 shall not exceed 10.30 tons VOC, combined, per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be determined through the permit requirements and recordkeeping contained in the terms of each individual emissions unit included in this emission limitation, and as specified in Section d)(5). Formulation data or U.S. EPA Method 24 shall be used to determine the VOCcontent of the materials.

h. Emissions Limitation:

The thermal oxidizer controlling the E-Coat ovenshall operate at a minimum VOC removal efficiency of 95%, by weight.

Applicable Compliance Method:

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

i. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

ii. Emission testing shall be conducted as least once every five years.

iii. The emission testing shall be conducted to determine the VOC control efficiency of the thermal oxidizer controlling the E-Coat oven. The permittee shall also determine the capture efficiency for the E-Coat oven.

iv. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR, Part 60, Appendix A, Methods 1-4, 25 or 25A, as appropriate.

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

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA, Central District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. 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,Central

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, Central District Office's refusal to accept the results of the emission test(s).

vii. Personnel from the Ohio EPA, Central 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.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central 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, Central District Office.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 60, Subpart MM.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

6. P001, Weld Operations

Operations, Property and/or Equipment Description:

Weld Operations, including spot and MIG welding operations, with solvent wiping and anti-spatter, sealer and adhesive usage with a natural gas fired 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 operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	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.
b.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/MMBtu of actual heat input. The PE limitation required pursuant to this rule is less stringent than the limitation for natural gas combustion established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of each anti-spatter, sealer, and adhesive applied to metal in this emissions unit shall not exceed 3.0 lb/gal, excluding water and exempt solvents.
d.	ORC 3704.03(T)	Emissions from natural gas combustion in emission units K002, K003, K004, K005, P001, and P002 combined shall not exceed: 24.53 tons of NOx per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Fugitive PE from MIG welding shall not exceed 1.20 lb/hr. Total VOC emissions from anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material usage shall not exceed 9.02 lb/hr. Emissions from natural gas combustion in emission units K002, K003, K004, K005, P001, and P002 combined shall not exceed: 0.43lb of PE/hr; 0.03lb of SO_2/hr; and 0.31 lb of VOC/hr. See b)(2)a., b)(2)c. and b)(2)d.
f.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
g.	OAC rule 3745-31-05(F), as effective 12/01/06 (to avoid BAT requirements)	Total VOC emissions from anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material usage shall not exceed 8.65 ton/yr. See b)(2)b. below.
h.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions apply to this emissions unit. The PALs for VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions from this facility as specified in B.3.
i.	40 CFR Part 63, Subpart IIII	See b)(2)e.
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule 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.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and SO_2, emissions from this air contaminant source since the calculated annual emission rate for PE and $SO_2$are each less than 10 tons per year taking into account the maximum total burner capacity established under ORC 3704.03(T).

ii. The permittee has agreed to voluntarily limit the VOC emissions from this emission unit to less than10 tons per year for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).

c. The hourly PE, SO_2 and VOC emission limitations are based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to establish compliance with these limitations.

d. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K002, K003, K004, K005, P001, and P002 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 remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3091 and are determined to be:

i. Except as provided in ii. below, combined organic hazardous air pollutant (HAP) emissions from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for

adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 0.60 lb/gal of coating solids deposited during each month.

ii. If meeting the operating limits of 63.3092(a) or (b), combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month. If there is no electrodeposition primer system, then combined organic HAP emissions from primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coating and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems are limited to no more than 1.10 lb/gal of coating solids deposited during each month.

iii. Average organic HAP emissions from all adhesive and sealer materials other than materials used as components of glass bonding systems are limited to no more than 0.010 lb/lb of adhesive and sealer material used during each month.

f. Table 2 to Subpart IIII of 40 CFR Part 63 - "Applicability of General Provisions to Subpart IIII of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

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

i. Section b)(1)d. through b)(1)g.;

ii. Section b)(2)a., through b)(2)d.; and

iii. Section f)(1)b. through f)(1)e.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month:

a. The name and identification of each VOC containing material (anti-spatter, solvent wiping, sealer, adhesive and miscellaneous materials) employed;

b. The VOC content of each material, as applied, in pounds per gallon;

c. The number of gallons of each material employed; and

d. The total VOC emissions from this emissions unit, in pounds or tons.

(2) In order to document the rolling, 12-month VOC emissionsK001, K002, K003, K004, K005, P001 and P002, the permittee shall maintain monthly records of the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K001, K002, K003, K004, K005, and P001, in pounds or tons per month;

b. the total VOC emissions from all cleanup and purge materials employed in K001, K002, K003, K004, and K005, in pounds or tons per month;

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials from K001, K002, K003, K004 and K005, to be credited to the calculations of the VOC emissions, in pounds or tons per month;

d. the total net VOC emissions from all cleanup/purge employed in emissions units K002, K003, K004, and K005, in pounds or tons per month, i.e., (b) – (c);

e. the total VOC emissions from all natural gas combustion sources, in pounds or tons per month; and

f. the total net VOC emissions from natural gas combustion and all coatings, reducing solvents, cleanup/purge, and other materials employed in emissions units K001, K002, K003, K004, K005, P001 and P002, in pounds or tons per month, i.e., (e) + (a) + (b) - (c).

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

(4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.0 lb VOC/gal excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify each day 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.

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

(5) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance is inherent based on the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.010 lb/MMBtu (7.6 lb of total PM/million standard cubic feet divided by 1020 MMBtu /million standard cubic feet).

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 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emissions Limitations:

Emissions from natural gas combustion from emissions units K002, K003, K004, K005, P001, and P002 combined:

0.43lb of PE/hr;
0.03lb of SO_2/hr;

24.53 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr; and
20.60 tons of CO per rolling, 12-month period.

Applicable Compliance Method:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lb of pollutant/MM ft^3) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO_2. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emissions Limitation:

Fugitive PE from MIG welding shall not exceed 1.20 lb/hr

Applicable Compliance Method:

The particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit. The following calculation was used to establish the limitation (based on best engineering judgment, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office April 9, 2012):

Hourly emissions = maximum MIG wire usage (120.00 lb/hr) x emission factor from Gradient Corporation and by the American Welding Company (0.01 lb particulate emissions/pound of MIG wire) = 1.20 lb PE/hour

d. Emission Limitation:

Total VOC emissions from anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material usage shall not exceed 9.02 lb/hr

Applicable Compliance Method:

The VOC emissions limitation was established by summing the maximum hourly potential emissions from theusage of anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material, as calculated in the permit application.

e. Emissions Limitation:

Total VOC emissions from anti-spatter, solvent wiping, sealer, adhesive and miscellaneous material usage shall not exceed 8.65 ton/yr (as applicable after U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

Compliance may be determined by summing the annual VOC emissions as maintained monthly in accordance with the recordkeeping requirements specified in Section d)(1) above.

f. Emission Limitation:

3.0 lb/gal excluding water and exempt solvents of each anti-spatter, sealer, and adhesive applied to metal.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(1) above.Formulation data from the manufacturer of the VOC containing material or U.S. EPA Method 24 shall be used to determine the VOC content.

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart IIII.

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.

7. P002, Inspection & Repair Sanding

Operations, Property and/or Equipment Description:

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions shall notexceed 20% opacity as a 6-minuteaverage, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from the sanding operations shall not exceed 2.5 pounds per hour, based upon Figure II of OAC rule 3745-17-11. The emission limitation specified by this rule is less stringent than the emissionlimitation established pursuant to OACrule 3745-31-05(A)(3).
c.	ORC 3704.03(T)	Emissions from natural gas combustion in emission units K002, K003, K004, K005, P001, and P002 combined shall not exceed: 24.53 tons of NO_x per rolling, 12-month period; and 20.60 tons of CO per rolling, 12-month period.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PE from the sanding operation shall not exceed 0.80 lb/hr. Emissions from natural gas combustion in emission units K002, K003, K004, K005, P001, and P002 combined shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.43lb of PE/hr; 0.03lb of SO_2/hr; and 0.31 lb of VOC/hr. See b)(2)a., b)(2)b., b)(2)c. and b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).
e.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d.
f.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions apply to this emissions unit. The PALs for VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of the total VOC, NO_x, CO, SO_2, GHG, PM, PM_{10},and $PM_{2.5}$ emissions from this facility as specified in B.3.

(2) Additional Terms and Conditions

a. The permittee shall vent particulate emissions from the repair sanding operations to the fabric filters controlling the emissions unit

b. The hourly PE, SO_2 and VOC emission limitations are based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to establish compliance with these limitations.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

d. This rule 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.

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO_2 and VOC emissions from this air contaminant source since the calculated annual emission rate for PE, SO_2 and VOC are each less than 10 tons per year taking into account the maximum total burner capacity established under ORC 3704.03(T).

e. Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in K002, K003, K004, K005, P001, and P002 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 remains below 56.0 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 b)(1) of this permit. An accurate list of the natural gas combustion sources in operation shall be maintained by the permittee and made available to Ohio EPA staff upon request.

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

i. Section b)(1)c. through b)(1)e.;

ii. Section b)(2)b., through b)(2)d.; and

iii. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever repair sanding is occurring inside the repair sanding booth.

(2) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records that document any time periods when the fabric filter control was not in operation when repair sanding operations occurred in this emissions unit.

(2) For each day during which the permittee burns a 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 quarterly deviation (excursion) reports that identify the following:

a. any record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and

b. each day 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) Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. <u>Emission Limitations</u>:

Emissions from natural gas combustion from emissions units K002, K003, K004, K005, P001, and P002 combined:

0.43 lb of PE/hr;
0.03 lb of SO_2/hr;
24.53 tons of NO_x per rolling, 12-month period;
0.31 lb of VOC/hr; and
20.60 tons of CO per rolling, 12-month period.

<u>Applicable Compliance Method</u>:

These limits represent the maximum capacity of each of the natural gas emission sources combined. These emission limitations were determined by multiplying the maximum natural gas usage from the burners by the emission factors for each pollutant (lb of pollutant/MM ft^3) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NO_x, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO_2. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

b. <u>Emission Limitation</u>:

PE from the sanding operations shall not exceed 0.80 lb/hr.

PE from the sanding operations shall not exceed 2.5 lb/hr.

Applicable Compliance Method:

The 0.80 lb/hr particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit. The following calculation was used to establish the limitation (based on best engineering judgment, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office on April 9, 2012):

For Repair Sanding:
(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (1 - control efficiency of fabric filter control)

For Inspection Sanding (no dry filter control):
(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour)

where,

- volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on April 9, 2012
- maximum quantity of units sanded = 4 per hour
- control efficiency of fabric filter = 95% (assumes 100% capture).

c. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.