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
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

John Eckstein, MS
Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway
Marysville Automobile Plant
Marysville, OH 43040

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: P0113353
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:	0180010193
Facility Name:	Honda of America Mfg., Inc., Marysville Auto Plant
Facility Description:	Motor Vehicles and Car Bodies
Facility Address:	24000 Honda Parkway Marysville, OH 43040-9251 Union County
Permit:	P0113353, 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 12/04/2013. The comment period ended on 01/03/2014.	
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.

Comments were received from Honda of America Services, LLC on 1/3/2014, 1/16/2014 and 1/23/2014. The comments and response to comments are provided below.

1. Facility Wide Terms and Conditions, T&C 15

   Please make one correction in the language of the last sentence in the permit condition.

   "..then all of the <u>applicable</u> requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply to the emissions unit(s)."

   This change has been made.

2. Emission Unit Terms and Conditions, B065 & B066, T&C e)(1)a.

   Both the current PTI and Title V permit specify that the permittee will submit a report to Ohio EPA for using fuel other than diesel fuel. The report is to be filed within 30 days of the deviation. Ohio EPA is proposing to change the reporting frequency to quarterly. Honda is concerned that this change which contravenes the current Title V permit terms could require a significant permit modification. Please proceed with proposed change in reporting frequency if Ohio EPA does not view the change in reporting frequency as a relaxation or significant change to a reporting requirement. Otherwise, please retain the current 30 day reporting requirement.

In general, unless a rule specifies a different reporting frequency, Ohio EPA has deemed quarterly reporting as sufficient to meet the requirements of OAC rule 3745-77-07(A)(3)(c). Since there is no rule that requires reporting a deviation from fuel usage within 30 days of the occurrence, Ohio EPA does not consider this change a relaxation or significant change to a reporting requirement. No change has been made as a result of this comment.

3. K007 – Final Repair Booths, T&C d)(6)

   Both the current PTI and Title V permit specify that the permittee will maintain records that document any time periods when the particulate emission control system is not operating when spraying non-lacquer coatings. This term and condition does not appear in the draft PAL permit. Because of the above mentioned concerns associated with significant permit modifications, please incorporate the recordkeeping language into the PAL permit.

   "(6) The permittee shall maintain records that document any time periods when the emissions unit did not meet the requirements of Section c)(1)."

   This change has been made.

4. K007 – Final Repair Booths, T&C e)(4)

   Please include the following reporting requirement in the final PAL permit. This requirement appears in both the current Title V and PTI.

   "(4) The permittee shall notify the Ohio EPA CDO in writing of any record showing that the fabric filter system was not in service when the emissions unit was in operation using a spray coating application. The notification shall include a copy of such record and shall be sent to the Ohio EPA CDO within 30 days following the end of the calendar quarter in which the exceedance occurs. This requirement does not apply to the use of air-dry lacquer coatings applied in this emissions unit."

   A quarterly deviation reporting requirement has been added. Please see the response to Comment 2 above.

5. K011 – Application Testing Facility, T&C e)(1)b.

   Both the current PTI and Title V permit specify that the permittee will submit a report to Ohio EPA for periods of time when the downdraft / scrubber system is not operational during coating spraying operations. The report is to be filed within 30 days of the deviation. Ohio EPA is proposing to change the reporting frequency to quarterly. Honda is concerned that this change which contravenes the current Title V permit terms could require a significant permit modification. Please proceed with proposed change in reporting frequency if Ohio EPA does not view the change in reporting frequency as a relaxation or significant change to a reporting requirement. Otherwise, please retain the current 30 day reporting requirement.

   Please see the response to Comment 2 above. No changes have been made as a result of this comment.

6. K201 – Line 1 E-Coat, T&C f)(1)d.

   Please make one correction to the permit term. Remove "shall" from the first sentence.

   This change has been made.

7. K237, Line 2 Topcoat, T&C d)(4)e.

   Please make one correction to the permit term d)(4) by adding "e" before the last 2 lines of the condition.

   This change has been made.

8. K240, LASD Line 1, T&C f)(1)b.

   Please make one minor correction to the term by removing "recordkeeping" from in front of "Emission Limitation".

   This change has been made.

9. Emissions Unit Group -Main Body Welding Lines: P004, P330

   Please correct the operations description for both P004 and P330. P004 is Weld Line 2 and P330 is Weld Line 1.

   This change has been made.

9. Emissions Unit Group -Main Body Welding Lines: P004,P330, T&C e)(2)

   Please label the second paragraph of the term and condition as T&C e)(3).

   This change has been made.

10. R001 – POPA Repair, T&C b)(1)a.

    Please remove the 10.7 tons VOC per year limitation from the BAT section. After reviewing PTI 01-00759, we believe that the appropriate BAT established for this emission unit is the VOC content limit of 6.37 lb/gal. The associated monitoring, recordkeeping, reporting, and testing terms can also be removed. Those terms are e)(3) and f)(1)a.

    These corrections have been made.

11. R003, PA Line 2 Inner-Cavity Wax Application, T&C e)(1)a.

    Please remove the phrase "or exceedance of the production limit on cars" from the term.

    Compliance with the particulate emissions limitation is based on meeting the requirements for the dry particulate filtration system. Since the permit already contains reporting associated with the dry particulate filtration system, reporting requirement e)(1) is unnecessary and has been removed from the permit.

12. Emissions Unit Group -Instrument Panel Pad Process: R021, R022, T&C b)(1)a.

    Please revise the permit language. Honda believes it understands that the terms and conditions apply to each individual emissions unit within the group as written. However, we would like to have the following included to clarify that the hourly limit is applied to each unit individually.

    "Organic compound and volatile organic compound (OC/VOC) emissions shall not exceed 3.10 pounds

per hour from each emissions unit (6.20 lb/hr combined)."

The language has been revised to clarify that the hourly OC/VOC limitation applies to each emissions unit.

13. Emissions Unit Group -Instrument Panel Pad Process: R021, R022, T&C d)(1)a.

Please revise the permit language to include an option to use test data or the default VOC factor of 0.5 lb per panel sheet for calculating emissions.

Since the 0.05 lb VOC per panel part emissions factor was based on testing of the facility's worst-case pad material, the language has been revised to state that the permittee shall use an emissions factor based on the most recent testing of the facility's worst-case pad material.

14. Emissions Unit Group -Instrument Panel Pad Process: R021,R022, T&C d)(2)

Please remove the air toxics language as written from the permit. The process does not employ any of the listed pollutants. Additionally, the current panel sheet's MSDS does not list any materials that are an air toxic.

This change has been made.

15. R103, PA Line 1 Inner-Cavity Wax Application, T&C e)(1)a.

Please remove the phrase "or exceedance of the production limit on cars" from the term.

See response to Comment 11 above.

16. R201, POPA Topcoat Process, T&C c)(1)

Please revise the operational restriction to the following:

"The permittee shall operate the concentrator and regenerative thermal oxidizer (RTO) whenever this unit is in operation."

The operational restriction was written in 2000 – 2001. Since that time OEPA published rule OAC 3745-21-07(M)(3)(a) & (b). Those rules specify a more strict control efficiency than the operational restriction in c)(1). Additionally, OEPA has already included these rules in the permit in term b)(2)a. Because this rule is now part of the approved State Implementation Plan, the original operational restriction is no longer relevant.

This change has been made.

17. R201, POPA Topcoat Process, T&C c)(2)

Please move term and condition d)(4) into Section c). This term is currently in Section c) of the active PTI.

As a result of the March 31, 2006, General Electric Lighting v. Jones decision rendered by the Ohio 10th Circuit Court of Appeal, Ohio EPA has agreed to place operational parameters for control equipment in the Monitoring and/or Recordkeeping sections of permits rather than the Operational Restrictions sections. No change has been made as a result of this comment.

18. R201, POPA Topcoat Process, T&C e)(1)

    Please revise the nomenclature of the term and condition as shown in the permit mark-up.

    This change has been made.

19. Please revise the testing language for emission units K201, K208, K235, K236, K237, K238, and R201 as shown in the permit mark-up.

    These changes have been made.

20. Please move the operational parameters for the K201 incinerator from the operational restrictions section to the monitoring and recordkeeping section.

    This change has been made.

Comments were received from U.S. EPA Region 5 dated 12/30/2013. The comments and response to comments are provided below.

21. OAC 3745-31-32(A)(11)(a)(i) requires the PAL permit to contain enforceable monitoring requirements that determine PAL pollutant emissions in terms of mass per unit time. The monitoring requirements do not yield mass-per-unit-time data for emissions units B036, B064, P342, P343, P344, and P346. The monitoring requirements for these emissions units must be modified to comply with the PAL monitoring regulations.

    Emissions units B036 and B064 are natural gas combustion sources. Facility-wide monitoring of monthly natural gas usage is required by B.4.d) in the Facility-Wide Terms and Conditions Section of the permit. B.4.d) requires the permittee to use the monthly usage records to calculate monthly facility-wide emissions of VOC, $PM_{2.5}$, PM_{10}, PM, NO_x, CO, SO_2, and GHG from all stationary natural gas combustion sources, including B036 and B064. A reference to B.4.d) of the Facility-Wide Terms and Conditions Section of the permit has been added to the monitoring and recordkeeping terms and conditions for B036 and B064.

    Monthly calculations of particulate emissions are required by C.29.d)(1), C.30.d)(1), C.31.d)(1) and C.32.d)(1) in the Emissions Unit Terms and Conditions section of the permit for emissions units P342, P343, P344 and P346, respectively. These requirements satisfy the monitoring requirements of OAC rule 3745-31-32(A)(11)(a)(i).

22. OAC 3745-31-32(A)(11)(f)(iii) requires that a facility using emission factors to monitor PAL pollutant emission shall conduct validation testing to determine a site-specific emission factor within six months of PAL permit issuance unless the director determines testing to not be required. Also, OAC 3745-31-32(A)(11)(i) requires that all data used to establish a PAL limit must be re-validated through performance testing or other scientifically valid means and that such testing must occur at least once every five years after issuance of the PAL. The draft permit shows that AP-42 emission factors will be used to determine compliance with the PAL emission limits, whereas doing emission testing to formulate a site-specific emission factor would give a better estimate of emissions. Please revise the permit so that it requires validation testing to determine site-specific emission factors to then be used to assure compliance with the emission limits, re-validated through performance testing at least once every five years, or explain why such emissions testing is not technically practicable.

    OAC 3745-31-32(A)(11)(f)(iii) requires validation testing to develop a site-specific emission factor when

a facility relies on an emission factor to calculate PAL pollutant emissions. This requirement applies to PAL significant emission units when it is technically practicable unless the director determines that testing is not required.

A PAL significant emission unit is defined as one that emits or has the potential to emit a PAL pollutant in an amount that is equal to or greater than the significant level as defined in this rule or in the Clean Air Act whichever is lower for that PAL pollutant, but less than the amount that would qualify the unit as a PAL major emissions unit as defined in this rule (OAC 3745-31-01(KKKK)).

Honda relies on emission factors from AP-42 for calculating emissions from natural gas-fired burners, boilers, water heaters, stationary diesel powered electric generators, and roadways. In addition, site-specific emission factors have been developed to calculate emissions from process welding, plastic injection, and instrument panel padding processes.

The following are the PAL significant emission units for pollutants that propose to use emission factors to calculate PAL pollutant emissions.

Emission Unit	*Facility*	*PAL pollutant*
K208 (MAP L1 Topcoat)	*Marysville Auto Plant*	*NOx*
K237 (MAP L2 Topcoat)	*Marysville Auto Plant*	*NOx*

Both of these emission units are coating lines where light duty and automobile bodies are coated with a color base coat and clear coat. Coating occurs in temperature and humidity controlled booths. Natural gas-fired air supply units provided the conditioned air for these booths. After coating, the paint is cured in natural-gas fired ovens. The following information describes the number of burners and size range for these coating lines:

Emission Unit	*Number of Individual Burners*	*Burner Size Range (MMBtu/hr)*
K208 (MAP L1 Topcoat)	*45*	*0.55 - 11*
K237 (MAP L2 Topcoat)	*24*	*0.63 - 14*

Collectively, the potential NOx emissions from all burners are above the significance level of 40 tons per year. However, each individual burner's contribution to the overall NOx level is below the significance level. As such, on a per burner basis, testing is not necessary for NOx under OAC rule 3745-31-32(A)(11)(f)(iii). And the OAC rule 3745-31-32(A)(11)(f)(iii) requirement for validation testing of emission factors is not required for any emission unit in the draft PAL permits.

OAC rule 3745-31-32(A)(11)(i) requires re-validation of all data used to establish the PAL at least every five years. Emissions testing data for emissions units K201, K208, K235, K236, K237, K238 and R201 at Marysville Auto Plant was used to establish the PAL for VOC. Re-validation testing in accordance with OAC rule 3745-31-32(A)(11)(i) has been established for emissions units K201, K208, K235, K236, K237, K238 and R201 at Marysville Auto Plant. The requirements of OAC rule 3745-31-32(A)(11)(i) do not apply to the emissions unit at Honda Engineering.

A comment was received from U.S. EPA Region 5 on February 14, 2014. The comment and response to comment are provided below.

23. 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.

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Honda of America Mfg., Inc., Marysville Auto Plant

Facility ID:	0180010193
Permit Number:	P0113353
Permit Type:	Administrative Modification
Issued:	3/28/2014
Effective:	3/28/2014

Division of Air Pollution Control
Permit-to-Install
for
Honda of America Mfg., Inc., Marysville Auto Plant

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Authorization

Facility ID:	0180010193
Facility Description:	Motor Vehicles and Car Bodies
Application Number(s):	A0046511, A0049034
Permit Number:	P0113353
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:	$5,800.00
Issue Date:	3/28/2014
Effective Date:	3/28/2014

This document constitutes issuance to:

Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway
Marysville, OH 43040-9251

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: P0113353
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: **B036**
Company Equipment ID: FA-HV-37
Superseded Permit Number: P0105666
General Permit Category and Type: Not Applicable

Emissions Unit ID: **B064**
Company Equipment ID: FA-AH-43
Superseded Permit Number: 01-08413
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K007**
Company Equipment ID: PA Final Repair Booths
Superseded Permit Number: P0108858
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K011**
Company Equipment ID: PA Automotive Test Facility
Superseded Permit Number: P0105664
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K201**
Company Equipment ID: PA Line 1 E-Coat
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K206**
Company Equipment ID: PA Primer/Surfacer Line 1
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K208**
Company Equipment ID: PA L1 Body Topcoat
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K224**
Company Equipment ID: Miscellaneous Sealers and Adhesive Application
Superseded Permit Number: 01-07448
General Permit Category and Type: Not Applicable

Emissions Unit ID: **K225**
Company Equipment ID: AF Miscellaneous Corrosion Protection/Lubricant Application
Superseded Permit Number: 01-07448
General Permit Category and Type: Not Applicable

Emissions Unit ID:	**K226**
Company Equipment ID:	AF Miscellaneous Metal Painting
Superseded Permit Number:	01-07448
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K235**
Company Equipment ID:	New Line 2 E-Coat
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K236**
Company Equipment ID:	New Line 2 Primer/Surfacer
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K237**
Company Equipment ID:	New Line 2 Topcoat
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K238**
Company Equipment ID:	New Line 2 Sealer/Deadner/LASD
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K239**
Company Equipment ID:	Paint Shop Polish Coating Lines 1 and 2
Superseded Permit Number:	P0108858
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K240**
Company Equipment ID:	LASD Line 1
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P201**
Company Equipment ID:	PA Line 1 E-coat Sanding
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P205**
Company Equipment ID:	PA Line 1 primer/surfacer sanding
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P223**
Company Equipment ID:	AF Misc Solvents
Superseded Permit Number:	01-6323
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P305**
Company Equipment ID:	Line 1 Paint Effluent System
Superseded Permit Number:	01-06647
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P341**
Company Equipment ID:	New Line 2 Sludge Pit
Superseded Permit Number:	P0111797
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P342**
Company Equipment ID:	New Line 2 E-coat Sanding
Superseded Permit Number:	P0111797

General Permit Category and Type: Not Applicable

Emissions Unit ID: **P343**
Company Equipment ID: New Line 2 Surfacer Sanding
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P344**
Company Equipment ID: New Line 2 Repair Sanding
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P346**
Company Equipment ID: PA Line 1 Repair Sanding
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P348**
Company Equipment ID: Injection Mold CM 1
Superseded Permit Number: P0104402
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P349**
Company Equipment ID: Line 1 MVH Foam Application
Superseded Permit Number: P0111481
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R001**
Company Equipment ID: POPA Repair
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R003**
Company Equipment ID: PA Line 2 Inner-Cavity Wax Application
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R016**
Company Equipment ID: PA Material Test Lab (MTL)
Superseded Permit Number: P0105664
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R102**
Company Equipment ID: PA Line 1 Sealer/Deadener Application
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R103**
Company Equipment ID: PA Line 1 Inner-Cavity Wax Application
Superseded Permit Number: P0111797
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R200**
Company Equipment ID: POPA Primer Booth & Oven
Superseded Permit Number: P0107750
General Permit Category and Type: Not Applicable

Emissions Unit ID: **R201**
Company Equipment ID: POPA Topcoat Process
Superseded Permit Number: P0107750
General Permit Category and Type: Not Applicable

Group Name: Generators

Emissions Unit ID:	**B065**
Company Equipment ID:	Generator #8
Superseded Permit Number:	01-08883
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**B066**
Company Equipment ID:	Generator #9
Superseded Permit Number:	01-08883
General Permit Category andType:	Not Applicable

Group Name: Injection Molding

Emissions Unit ID:	**P332**
Company Equipment ID:	PL Injection Molding MHI 11
Superseded Permit Number:	01-08010
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P333**
Company Equipment ID:	PL Injection Molding MHI 8
Superseded Permit Number:	01-08010
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P336**
Company Equipment ID:	PL Injection Molding MHI 7
Superseded Permit Number:	01-08010
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P345**
Company Equipment ID:	Plastic Injection Molding (CM-5)
Superseded Permit Number:	01-08894
General Permit Category andType:	Not Applicable

Group Name: Instrument Panel Pad Process

Emissions Unit ID:	**R021**
Company Equipment ID:	Pad #3 instrument panel adhesive and laminated sheet
Superseded Permit Number:	01-06380
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R022**
Company Equipment ID:	Pad #4 instrument panel adhesive and laminated sheet
Superseded Permit Number:	01-06380
General Permit Category andType:	Not Applicable

Group Name: Main Body Welding Lines

Emissions Unit ID:	**P004**
Company Equipment ID:	Welding Line 2
Superseded Permit Number:	P0111797
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P330**
Company Equipment ID:	Welding Line 1
Superseded Permit Number:	P0111797
General Permit Category andType:	Not Applicable

Group Name: POPA Paint

Emissions Unit ID:	**P307**
Company Equipment ID:	POPA Paint Effluent System

Superseded Permit Number:	01-08167
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P340**
Company Equipment ID:	POPA New Paint Effluent System
Superseded Permit Number:	01-08167
General Permit Category andType:	Not Applicable

Group Name: Weld Sealers

Emissions Unit ID:	**P005**
Company Equipment ID:	Line 2 Weld Sealers
Superseded Permit Number:	01-08541
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P200**
Company Equipment ID:	Line 1 Weld Sealer
Superseded Permit Number:	01-08541
General Permit Category andType:	Not Applicable

Group Name: Weld Wipe

Emissions Unit ID:	**R023**
Company Equipment ID:	MAP Line 1 Weld Wipe
Superseded Permit Number:	01-4184
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R024**
Company Equipment ID:	MAP Line 2 Weld Wipe
Superseded Permit Number:	01-4184
General Permit Category andType:	Not Applicable

Group Name: Wheel Well Blackout

Emissions Unit ID:	**K227**
Company Equipment ID:	Line 1 Wheel Well Blackout
Superseded Permit Number:	P0111797
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K228**
Company Equipment ID:	Line 2 Wheel Well Blackout
Superseded Permit Number:	P0111797
General Permit Category andType:	Not Applicable

Group Name: Window Install Lines

Emissions Unit ID:	**K221**
Company Equipment ID:	K221
Superseded Permit Number:	P0111797
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K222**
Company Equipment ID:	K222
Superseded Permit Number:	P0111797
General Permit Category andType:	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 obtained beforeoperating 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 the facility, (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 Office in accordance with the applicable Title V operating permit program. The reports shall meet the following requirements [OAC rule 3745-31-32(A)(13)]:

(1) 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 the results 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 number 0180010193 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:

K007 (PA Final Repair Booths);
K201 (PA E-coat Line 1);
K206 (PA Primer/Surfacer Line 1);
K208 (PA Topcoat Line 1);
K221 (AF Line 1 Window Install and Off-line glass repair);
K222 (AF Line 2 Window Install);
K227 (Line 1 Wheel Well Blackout);
K228 (Line 2 Wheel Well Blackout);
K235 (Line 2 E-coat);
K236 (Line 2 Primer/Surfacer);
K237 (Line 2 Topcoat);
K238 (Line 2 Sealer/Deadener/LASD);
K240 (Line 1 LASD);
P004 (Weld Line 2);
P005 (Line 2 Weld Sealers);
P200 (Line 1 Weld Sealer);
P330 (Weld Line 1);
P349 (Line 1 MVH Foam Application);R003 (PA Line 2 Inner-Cavity Wax);
R102 (PA Line 1 Sealer/Deadener); and
R103 (PA Line 1 Inner-Cavity Wax Application).

The following emissions units at premise number 0180010193 are subject to either 40 CFR Part 63, Subpart PPPP or 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:

R001 (POPA Repair)

R200 (POPA Primer Booth & Oven)

R201 (POPA Topcoat Process)

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

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

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

a) New installation of an emissions unit that emits a toxic air contaminant identified under OAC rule 3745-114-01;

b) Changes in the composition of the materials used, or the use of new materials, that would result in the emissions of a 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 01800101093 in Permit to Install (PTI) P0105666 issued 12/15/2009, for emissions unit B036; PTI 01-08413 issued 7/17/2001, for emissions unit B064; PTI 01-08883 issued 2/15/2005, for emissions units B065 and B066; PTI P0108858 issued 4/20/2012, for emissions units K007 and K239; PTI P0111797 issued 7/1/2013, for emissions units K201, K206, K208, K221, K222, K227, K228, K235, K236, K237, K238, K240, P004, P330, P201, P205, P341, P342, P343, P344, P346, R003, R102 and R103; PTI P0105664 issued 6/30/2010, for emissions units K011 and R016; PTI 01-07448 issued 2/12/2009, for emissions units K224, K225 and K226; PTI 01-08541 issued 7/9/2002, for emissions units P005 and P200; PTI 01-06323 issued 3/4/1998, for emissions unit P223; PTI 01-06647 issued 12/28/2000, for emissions unit P305; PTI 01-08167 issued 4/21/2005, for emissions units P307 and P340; PTI 01-08010 issued 9/1/2005, for emissions units P332, P333 and P336; PTI 01-08894 issued 9/1/2005, for emissions unit P345; PTI P0104402 issued 4/9/2009, for emissions unit P348; PTI P0111481 issued 2/27/2013 for emissions unit P349; PTI 01-759 for emissions unit R001; PTI 01-06380 issued 4/3/2001, for emissions units R021 and R022; PTI 01-4184 issued 10/30/1998, for emissions units R023 and R024; and PTI P0107750 issued 6/1/2011, for emissions units R200 and R201.

12. The following emissions units contained in this permit are subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart MM: K201, K206, K208, K235, K236, and K237. 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 permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light Duty Trucks (40 CFR Part 63, Subpart IIII) as an existing major source with a compliance date as specified in the final standard. The following emissions units contained in this permit are subject to 40 CFR 63, Subpart IIII: K007, K201, K206, K208, K221, K222, K227, K228, K235, K236, K237, K238, K240, P004, P005, P200, P330, P349, R003, R102, and R103. 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.

14. The permittee is subject to the rules of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) as an existing major source with a compliance date specified in the final standard. The following emission units contained in this permit are subject to 40 CFR 63, Subpart PPPP: R001, R200 and R201. Because these emission units are co-located at an affected source subject to 40 CFR 63 Subpart IIII, the permittee has the option under 40 CFR 63.3082(c) for these units to be subject to 40 CFR Part 63, Subpart IIII. If the permittee decides to include one or more these emission units in the existing affected source subject to 40 CFR Part 63, Subpart IIII, the requirements of 40 CFR Part 63, Subpart PPPP will no longer apply to those emission units. The complete MACT requirements, including the

MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA, Central District Office.

15. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions units B064 and B065 are considered "existing limited use stationary reciprocating internal combustion engines" and therefore are not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A. They are considered "limited use" because they are operated less than 100 hours per year. If the permittee elects to operate B064 and/or B065 as an affected source other than a limited use RICE then all of the applicable requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply to the emissions unit(s).

C. Emissions Unit Terms and Conditions

1. B036, FA-HV-37

Operations, Property and/or Equipment Description:

10 MMBtu/hr natural-gas fired space heater

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Nitrogen oxide (NOx) emissions shall not exceed 0.1 lb/MMBtu Carbon monoxide (CO) emissions shall not exceed 0.084 lb/MMBtu See b)(2)a. below.
b.	OAC rule 3745-18-06(G)	Exempt, pursuant to OAC rule 3745-18-06(B).
c.	OAC rule 3745-110-03(B)	Exempt, pursuant to OAC rule 3745-110-02.
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.

(2) Additional Terms and Conditions

a. The lb/MMBtu actual heat input emission limitations are based on the emissions unit's potentials to emit based on the burning on natural gas in the emissions unit.

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

i. Section b)(1)a.;

ii. Section b)(2)a.; and

iii. Section f)(1)a. and f)(1)b.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) 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.

(2) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

(1) 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 reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions.

f) Testing Requirements

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

a. <u>Emission Limitation</u>

NOx emissions shall not exceed 0.1 lb/MMBTU

<u>Applicable Compliance Method</u>

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table

1.4-1 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 100 lb NOx/10^6 scf natural gas emission factor (SCC 1-01-006-02) into lb NOx/MMBtu by dividing by 1,000 Btu/10^6 scf natural gas.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

b. Emission Limitation

CO emissions shall not exceed 0.084 lb/MMBtu

Applicable Compliance Method

The permittee may demonstrate compliance with the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 84 lb CO/10^6 scf natural gas emission factor into lb CO/MMBtu by dividing by 1,000 Btu/scf.

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

g) Miscellaneous Requirements

(1) None.

2. B064, FA-AH-43

Operations, Property and/or Equipment Description:

Space Heater, 14.16 MMBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from natural gas combustion shall not exceed: 0.03 lb particulate emissions/hr; 1.42 lb NOx/hr; 0.01 lb SO2/hr; 1.19 lb CO/hr; and 0.08 lb OC/hr. Visible particulate emissionsshall not exceed 20% opacity, as a 6-minuteaverage, except as provided by rule. See b)(2)c. and c)(1) below.
b.	OAC rule 3745-17-07(A)	None, see b)(2)b. below.
c.	OAC rule 3745-17-11(B)(1)	None, see b)(2)a. below.
d.	OAC rule 3745-18-06	Exempt pursuant to OAC rule 3745-18-06(A)
e.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I, per OAC rule 3745-17-11(A)(4), does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. The hourly emission limitations specified in Section b)(1)a. reflect the emissions unit's potentials to emit based on the burning on natural gas in the emissions unit.

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

i. Section b)(1)a.;

ii. Section b)(2)c.; and

iii. Section f)(1)a. and f)(1)b.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) 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.

(2) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

(1) 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 reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions.

f) Testing Requirements

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

a. Emission Limitation

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

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).

b. Emission Limitations

Emissions from natural gas combustion shall not exceed:

0.03 lb particulate emissions/hr;
01.42 lb NOx/hr;
0.01 lb SO2/hr;
01.19 lb CO/hr; and
0.08 lb OC/hr.

Applicable Compliance Method

The hourly emission limitations were established by multiplying the emissions unit's maximum hourly natural gas usage rate (14,160 ft^3/hr) by the appropriate emission factors for each pollutant from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 and Table 1.4-2 (7/98) for natural gas (lb/mm ft^3).

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Generators: B065,B066

EU ID	Operations, Property and/or Equipment Description
B065	2935 HP diesel generator (no. 8)
B066	2935 HP diesel generator (no. 9)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from this emissions unit shall not exceed: 70.58 pounds per hour (lb/hr) of nitrogen oxides (NOx); 18.75 lb/hr of carbon monoxide (CO); 7.72 lb/hr of particulate emissions (PE); 11.14 lb/hr of sulfur dioxide (SO_2); and 1.81 lb/hr of volatile organic compounds (VOC). The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-32(A)(6), 3745-17-11(B)(5)(b), and 3745-17-07(A). See b)(2)b. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the total VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(5)(b)	PE from the engine's exhaust shall not exceed 0.062 lb/MMBtu actual heat input.
e.	OAC rule 3745-18-06(G)	SO_2 emissions shall not exceed 0.5 lb/MMBtu actual heat input. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	40 CFR Part 63, Subpart ZZZZ	See b)(2)a. below.

(2) Additional Terms and Conditions

a. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions units B065 and B066 are operated as “existing limited use stationary reciprocating internal combustion engine" and therefore are not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A.

If the permittee elects to operate a generator as an existing affected source other than a limited use RICE then the requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

b. The hourly emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, with the exception of the fuel oil analysis, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limits.

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

i. Section b)(1)a.;

ii. Section b)(2)b.; and

iii. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall only burn diesel fuel, containing no greater than 0.5% sulfur by weight, in this emissions unit.

(2) If the permittee elects to operate a generator as an existing affected source other than a limited use RICE, then the operational restrictions of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

d) Monitoring and/or Recordkeeping Requirements

(1) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO_2 emission rate (in lb/MMBTU). The SO_2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, SW-846 Method 5050 or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the director.

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

(3) If the permittee elects to operate a generator as an existing affected source other than a limited use RICE, then the monitoring and/or recordkeeping requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

e) Reporting Requirements

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

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

b. any exceedance of the sulfur content fuel restriction specified in c)(1) above.

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

(2) If the permittee elects to operate a generator as an existing affected source other than a limited use RICE, then the reporting requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

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 Limitations

70.58 pounds per hour (lb/hr) of nitrogen oxides(NOx);
18.75 lb/hr of carbonmonoxide (CO);
7.72 lb/hr of particulateemissions (PE)*;
11.14 lb/hrof sulfur dioxide (SO_2); and
1.81 lb/hr of volatileorganic compounds (VOC)

Applicable Compliance Method

The above hourly limitations were established by multiplying the maximum hourly heat input rating for the diesel generator of 22.06 MMBtu/hr by the appropriate emission factor below from U.S. EPA's AP-42, Volume I, Fifth Edition, Section 3.4, "Large Stationary diesel and All Stationary Dual-fuel Engines", Table 3.4-1, October 1996.

Pollutant	Emission Factor
NOx	3.2 lb/MMBtu
CO	0.85 lb/MMBtu
PE*	0.35 lb/MMBtu
SO_2	1.01 x (0.5% sulfur content) lb/MMBtu
VOC	0.0819 lb/MMBtu

If required, emissions testing shall be conducted using the following test methods: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for PE, Method 7E for NOx, Method 10 for CO, Method 6C for SO2 and Methods 18, 25, or 25A for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

*See f)(1)b. below.

b. Emission Limitation

PE from the engine's exhaust shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined based on the emission factor of 0.062 lb/MMBtu specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4-6, Table 3.4-2 (10/96) for "Large Stationary diesel and All Stationary Dual-fuel Engines".

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation

SO_2 emissions shall not exceed 0.5 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined based on the emission factor of 1.01 x (0.5% sulfur content) lb/MMBtu specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4-6, Table 3.4-2 (10/96) for "Large Stationary diesel and All Stationary Dual-fuel Engines".

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation

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

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).

(2) If the permittee elects to operate a generator as an existing affected source other than a limited use RICE, then the testing requirements of 40 CFR 63, Subpart A and 40 CFR Part 63, Subpart ZZZZ shall apply.

g) Miscellaneous Requirements

(1) None.

4. K007, PA Final Repair Booths

Operations, Property and/or Equipment Description:

Final Repair, with 4 coating booths equipped with natural-gas fired air supply units and dry filtered exhaust, hand held cup spray coating applicators, coating applicators that do not generate coating overspray (i.e. hand held brushes), infrared drying equipment, dryers heated with natural gas, and buffing, polishing and sanding equipment.

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)(d)	Volatile organic compound (VOC) emissions from coatings shall not exceed 4.8 pounds per gallon (lb/gal) of coating, excluding water and exempt solvents, as a daily volume weighted average.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	PE from sanding and buffing shall not exceed 2.10 lb per hour (lb/hr) and there shall be no visible emissions from any facility opening in the vicinity of the sanding/buffing operations. VOC emissions from non-coating materials (polish and other repair materials) shall not exceed 4.8 lb/gal of material, including water and exempt solvents. Emissions from the combustion of natural gas in the air supply unit(s) shall not exceed the following: 0.04 lb PE/hr (filterable) 0.01 lb sulfur dioxide (SO_2)/hr

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		2.01 lb nitrogen oxide (NO_x)/hr 1.69 lb carbon monoxide (CO)/hr 0.11 lb VOC/hr from burners. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1) and 3745-31-32(A)(6). See b)(2)a. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
e.	OAC rule 3745-31-05(F), as effective 12/01/06 (to avoid BAT requirements)	Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr. See b)(2)b. below.
f.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
g.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The 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, SO_2, NO_x, and CO emissions from this emissions unit because annual emissions of each pollutant are less than ten tons per years.

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. In order to test the spray applicators effect, coatings being tested in the Automotive Test Facility (ATF) and the Materials Test Lab (MTL) labs may be applied to parts, components, and/or test panels in the Final Repair Booth (K007). Honda shall include the emissions from this application of ATF and MTL test coatings in Final Repair as part of the emissions calculated for emissions units K011 (ATF) and R016 (MTL).

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

i. Section b)(1)c., b)(1)d., b)(1)e.;

ii. Section b)(2)a., b)(2)b.;

iii. Section d)(2), d)(3)e.;

iv. Section e)(2); and

v. Section f)(1)b. through f)(1)f.

c) Operational Restrictions

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

(2) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 $C_{VOC,2}$.

(2) The permittee shall collect and record the following information each month for non-coating materials (polishes and other repair materials) used in the final repair operations:

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

b. the VOC content of each non-coating material, as applied.

(3) The permittee shall collect and record the following information each month for the purpose of determining annual and 12-month rolling emissions:

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

b. the VOC content of each coating and each non-coating material (polish and other repair material) employed, in pounds per gallon;

c. the number of gallons of each coating and non-coating material (polish and other repair materials) employed;

d. the total VOC emissions from all coatings and non-coating materials (polish and other repair materials) employed; and

e. the annual summation of VOC emissions from all coatings and non-coating materials employed, in tons.

(4) The permittee shall maintain records that document any time periods when theemissions unit did not meet the requirements of Section c)(1).

(5) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

(6) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Central District Office (CDO) in writing of any daily record showing that the daily volume-weighted average VOC content of coatings exceeded 4.8 lb/gal of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA CDO within 45 days after the exceedance occurs.

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

a. any monthly record showing that the use of noncomplying non-coating materials (polish and other repair materials) exceeding 4.8 lb/gal of coating, including water and exempt solvents; and

b. any record showingthat the fabric filter system was not in service when the emissions unit was inoperation using a spray coating application.Thisrequirement does not apply to the use of air-dry lacquer coatings applied in thisemissions 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 notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

4.8 lb VOC/gal of coating, excluding water and exempt solvents, as a daily volume weighted average

<u>Applicable Compliance Method</u>:

Compliance with the coating VOC limit shall be determined through daily recordkeeping of the organic compound content of each coating and material used less water and exempt solvents. Formulation data from each material's manufacturer or U.S. EPA Method 24 shall be used to determine the volatile organic compound 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 $C_{VOC,2}$.

b. Emission Limitation:

4.8 lb VOC/gal of non-coating material, including water and exempt solvents,

Applicable Compliance Method:

Compliance with the non-coating material (polish and other repair materials) VOC content limit shall be determined through monthly recordkeeping of the organic compound content of each non-coating material used. Formulation data from each material's manufacturer or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the materials.

c. Emission Limitation:

2.10 lb PE/hr from sanding and buffing

Applicable Compliance Method:

Compliance with this limit has been determined through the application of the following engineering calculations of potential emissions:

Units/yr	Area sanded (ft^2) per unit	Sanding depth (ft)	PE density (lb/ft^3)	Uncontrolled PE (lb/yr)
90,000	16.36	1.64×10^{-5}	68.68	1659
90,000	1.5	9.84×10^{-5}	68.68	913
90,000	1.5	9.84×10^{-5}	106.15	1410
10,000	1.0	9.84×10^{-5}	99.9	98
50	16.36	5.577×10^{-4}	106.15	48

Total Emissions: = 4,128 lb PE/yr

= 2.06 tons PE/yr

@ 2,000 hours of operation/yr = 2.06 lb PE/hr

Since these calculations represent the worst-case and the potential emissions from sanding, no other demonstration of compliance is required.

d. Emission Limitation:

No visible emissions from any facility opening in the vicinity of the sanding/buffing operations

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).

e. Emissions Limitation:

VOC emissions shall not exceed 10 tons per year (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 with this limit may be determined through summing the annual VOC emissions from all coatings and non-coating materials with the annual VOC emissions from the combustion of natural gas in the air supply unit(s).

f. Emissions Limitation:

Emissions from the combustion of natural gas in the air supply unit(s) shall not exceed the following:

0.04 lb PE/hr
0.01 lb SO_2/hr
2.01 lb NO_x/hr
1.69 lb CO/hr
0.11 lb VOC/hr
from burners

Applicable Compliance Method:

These limits represent the maximum capacity of the air supply unit burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (20,120 ft^3/hr) by the emission factors for each pollutant (lb of pollutant/$MMft^3$) found in "Compilation of Air Pollutant Emission Factors," the 7/98 edition of AP-42, Tables 1.4-1 and 1.4-2. Since these limits reflect potential emissions of the burners, no additional compliance determination is required.

g. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

5. K011, PA Automotive Test Facility

Operations, Property and/or Equipment Description:

Application Testing Facility (ATF) coating operations with natural gas drying burners and electric drying oven

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

(1) b)(1)h.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The organic compound (OC) content of coatings and reducing solvents shall not exceed 4.6 pounds OC per gallon (lb OC/gal) as a monthly, volume-weighted average. PE from coating overspray shall not exceed 0.551 lb/hr. The emissions from the natural gas drying oven shall not exceed: 0.04 lb PE/hr; 2.16 lb NO_x/hr; 1.81 lb CO/hr; 0.01 lb SO_2/hr; and 0.12 lb OC/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-32(A)(6). See c)(1) below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(U)(2)(f)	The organic compound (OC) content of coatings and reducing solvents shall not exceed 4.6 pounds OC per gallon (lb OC/gal) as a monthly, volume-weighted average. Exemption from OAC rule 3745-21-09(U)(1) for PTI that meets the provisions under this paragraph.
d.	OAC rule 3745-17-11(C)	See b)(2)c. below.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided byrule.
f.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
g.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. In order to test the spray applicator's effect, coatings being tested in ATF can be applied to parts, components, and/or test panels in the Final Repair Booth (K007). Honda shall include the emissions from this application of ATF test coatings in the Final Repair paint booth as part of the emissions calculated for this emissions unit.

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

i. Section b)(1)a; and

ii. Section f)(1)b. through f)(1)c.

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

c) Operational Restrictions

(1) The permittee shall operate the downdraft/scrubber control whenever spray coating is applied to this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit, for the purpose of determining rolling, 12-month emissions:

a. the name and identification of each coating and reducing solvent employed;

b. the OC content and the number of gallons of each coating and reducing solvent applied;

c. the monthly volume-weighted average OC content of all coatings and reducing solvents applied, calculated as specified in Section f)(1)b; and

d. the calculated total organic compound emission rate for all coatings and reducing solvents, in pounds per month.

(2) The permittee shall maintain daily records that document any time periods when the downdraft/scrubber control was not in service when spray coating was applied in this emissions unit.

(3) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

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

a. any record of an exceedance of the monthly volume-weighted average OC content of 4.6 pounds per gallon of coating and reducing solvent; and

b. any daily record showing that the downdraft/scrubber 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) 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:

4.6 lb OC per gallon of coating and reducing solvent as a monthly, volume weighted average

Applicable Compliance Method:

Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping, as specified in d)(1). Formulation data from the coating manufacturer or U.S. EPA Method 24 shall be used to determine the OC content of the coatings, to be used in the calculation of emissions. The monthly volume weighted average OC content shall be calculated and summed, for each coatings and reducing solvent applied during the month,as follows:

[(lb OC/1 gal of coating) x (gal of coating) / (gal of coating + gal of reducing solvent)] + [(lb OC/1 gal of reducing solvent) x (gal of reducing solvent) / (gal of coating + gal of reducing solvent)]

b. Emission limitation from natural gas drying oven

0.04 lb PE/hr;
2.16 lb NO_x/hr;
1.81 lb CO/hr;
0.01 lb SO_2/hr; and
0.12 lb OC/hr.

Applicable Compliance Method:

These limits represent the maximum capacity of the drying oven. These emission limitations were determined by multiplying the maximum natural gas usage from the drying ovens (21,600 ft^3/hr) 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. Since these limits reflect the

potential emissions of the burners, no additional compliance determination is required.

c. Emission Limitation:

0.551 lb PE/hour from coating overspray

Applicable Compliance Method:

Daily compliance with this limit shall be based on maintaining the requirements for the downdraft/scrubber control equipment found in Sections c)(1), d)(2), and e)(1)b. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60,Appendix A, Method 5.

d. Emission Limitation:

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

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 OACrule 3745-17-03(B)(1).

e. 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 PE 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).

g) Miscellaneous Requirements

(1) None.

6. K201, PA Line 1 E-Coat

Operations, Property and/or Equipment Description:

Line 1 e-coat with gas-fired makeup air and oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 1.12 lb/gallon of coating, as applied, excluding water and exempt solvents (free solvent). See b)(2)b. below. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed: 8.14 lb of particulate emissions (PE)/hr; 0.26 lb of sulfur dioxide (SO_2)/hr; 46.93 lb of nitrogen oxide (NOx)/hr; 36.69 lb of carbon monoxide (CO)/hr; 2.50 lb of VOC/hr; and The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-32(A)(6) and 3745-21-09(C)(1). See b)(2)c. through b)(2)f. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO_2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO_2, GHG,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM, PM10, and PM2.5 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, NOx, CO, SO_2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(C)(1)(a)	See b)(2)f. below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR 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) and OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(E)	See b)(2)g. below.
f.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. This emissions unit includes a series of open, uncontrolled tanks (baths) consisting of a mix of water, solvent, resin and paste. Vehicle body frames are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal incinerator. The uncontrolled emissions from the tanks and transfer area released prior to entering the oven are referred to as “free solvent” emissions for the purposes of this permit. The controlled emissions from the oven curing process are referred to as “cure volatiles” for the purposes of this permit.

b. This emissions unit shall not exceed the following:

i. <u>When the solids turnover ratio (R_T)* is 0.160 or greater</u>:

(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).

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

d. The emission limitation specified under OAC rule 3745-31-05(A)(3) is based on an assumed oven capture efficiency of 95%, by weight, as estimated in the permit to install application and shall be used for emissions calculations until testing is conducted. The capture efficiency may be adjusted based on the results of testing required in f)(1)d. below.

e. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 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. This emissions unit shall not exceed the following:

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

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

RT = Te/Le

where:

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

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

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

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

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

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

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

i. Section b)(1)a.;

ii. Section b)(2)b., b)(2)d. b)(2)e.;

iii. Section e)(2); and

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

c) Operational Restrictions

(1) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and maintain monthly records which contain the following information for materials added to the e-coat process:

a. the name and identification of each coating and solvent added to the EDP system; and

b. the VOC content of each coating and solvent (excluding water and exempt solvents), as added to the EDP system, in lb VOC/gal.

(2) The permittee shall collect and maintain monthly records which contain the following information for materials added to the EDP system for the purpose of determining the contribution of coatings (resin and paste) and solvent employed in this emissions unit and to determine compliance with the VOC PAL limitation) and compliance with the pound of VOC/gal limitation specified in b)(1)):

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

b. the VOC content of each coating (free solvent) and solvent employed, in pounds per gallon;

c. the number of gallons of each coating and solvent employed, in gallons;

d. the total VOC emissions from all coatings and solvent employed, (excluding cleanup and purge materials maintained in d)(3) and d(4) in pounds per month, i.e., the summation of the materials employed (“b” x “c”);

e. the volume solids content of each coating added to the system;

f. the amount of solids, in gallons (“c” x “e” x transfer efficiency);

g. the monthly volume-weighted average VOC content of the coatings (free solvent), as applied (“d” / “f”);

h. the VOC content of the cure volatiles of each coating employed**, in pounds per gallon;

i. the total uncontrolled cure volatile VOC emissions, in pounds per month (“h” x “c”);

j. the total VOC emissions (free solvent + controlled cure volatiles), in pounds or tons per month, using the most recent test results (“d” + “i” x [1 – oven capture efficiency x thermal incinerator destruction efficiency]);

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

l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (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

m. the calculated VOC emission limitation according to the calculation in b)(2)b.ii above if the turnover ratio is greater than or equal to 0.040 and less than 0.160.

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

Cure Volatiles = Total VOC – Free Solvent.

(3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the VOC Plantwide Applicability Limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-coating Sanding
P343-Line 2 Surfacer Sanding

P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating
Any new emission or modified unit associated with the permittee's body painting operations

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.

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in d)(3) above:

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 applied (a) in the emissions units listed in d)(3) above, times each material's VOC content (b).

(5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation:

a. the date the recovery tank was emptied;

b. the date the materials from the recovery tank were shipped off site;

c. the number of gallons of materials from the recovery tank shipped off site;

d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, R003, and from the cleanup and purge materials applied in the emissions units listed in d)(3), i.e., (c) x (d).

(6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103 and R003;

b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in d)(3);

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (see d)(5)e. above), to be credited to the calculations of the Line 1/Line 2 VOC emissions, recorded and calculated as per d)(5) above; and

d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units , in pounds or tons per month, i.e., (a) + (b) - (c).

(7) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the e-coat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance.

(8) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature of the thermal incinerator when the e-coat oven is processing units (vehicles). The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the e-coat oven was processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the e-coat oven was processing units.

(10) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

(11) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average temperature within the thermal incinerator, when the e-coat oven was processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance (Compliance with this reporting requirement also satisfies compliance with 40 CFR 60.7(c).);

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

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

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

(2) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of non-complying coatings, exceeding 1.12 lb VOC/gal coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

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

VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas or 1.4 lb/gas, as a monthly volume-weighted average.

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

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

cure volatiles) shall not exceed 1.0 x $350^{(0.160-\ RT)}$ lb/gas or 1.4 x $350^{(0.160-\ RT)}$ lb/gas, as a monthly volume-weighted average.

Applicable Compliance Method:

Compliance with these emission limitations shall be determined through the monthly recordkeeping requirements, as specified in d)(2) above.

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping as specified in d)(1) Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26lb of SO_2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emission Limitation:

VOC emissions from the e-coat oven shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight.

Applicable Compliance Method:

i. The permittee shall conduct emission testing shall to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. The following test methods shall be employed to demonstrate compliance with the VOC control efficiency requirements:

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

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

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

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

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

iv. The capture efficiency of the e-coat oven controlling cure volatiles shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

v. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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

vii. 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).

viii. 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.

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

e. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

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

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

g) Miscellaneous Requirements

(1) None.

7. K206, PA Primer/Surfacer Line 1

Operations, Property and/or Equipment Description:

Line 1 primer/surfacer with gas-fired makeup air and oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO_2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; and 2.50 lb of VOC/hr. PE from coating overspray shall not exceed 2.60 lb/hr See b)(2)a. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1), 3745-17-07(A)(1), and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the total VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(C)(1)(a)(v)	VOC emissions shall not exceed 2.8 lb/gallon of coating minus water and exempt solvents or 15.1 lb/gallon of deposited solids, either as a daily volume-weighted average.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from a stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
f.	OAC rule 3745-17-11(C)	See b)(2)d. below
g.	40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 Kg/liter of applied coating solids, as a monthly volume-weighted average.
h.	OAC rule 3745-18-06(E)	See b)(2)b. below
i.	40 CFR Part 60, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1) 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.

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

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

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

i. Section b)(1)a.;

ii. Section b)(2)a.; and

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

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

c) Operational Restrictions

(1) The permittee shall operate the downdraft/scrubber control system whenever spray coating is being applied in this emissions unit.

(2) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with OAC rule 3745-21-09(C)(1)(a)(v), the permittee shall maintain records for the guide/primer coating 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 may be calculated, recorded, and maintained at the end of each month as either:

e. the daily volume-weighted average of VOC per gallon of deposited solids; or

f. the daily volume-weighted average of VOC per gallon of coating minus water and exempt solvents.

(2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the applicable VOC Plantwide Applicability Limitation :

a. the name and identification of each coating, reducing solvent, or other material employed;

b. the VOC content of each coating, reducing solvent, or other material employed;

c. the number of gallons of each coating, reducing solvent, or other material employed; and

d. the total VOC emissions from all coatings, reducing solvents, and/or other materials 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 coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b).

(3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with VOC Plantwide Applicability Limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-Coat Line 1
K206-PA Primer/Surfacer Line 1
K208-Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat

K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Existing Line 1 and Line 2 Polish
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating
K240-Line 1 LASD
Any new emission or modified unit associated with the permittee's body painting operations.

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.

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in Section d)(3), above:

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 applied(a) in the emissions units listed in Section d)(3), above, times each material's VOC content (b).

(5) 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 Plantwide Applicability 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 OC/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 OC/VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total OC/VOC emissions from all

coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, R003, and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), i.e., (c) x (d).

(6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103, and R003;

b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3);

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, recorded and calculated as per Section d)(5); and

d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units, in pounds or tons per month, i.e., (a) + (b) - (c).

(7) The permittee shall maintain records that document any time periods when the downdraft/scrubber control was not in service when spray coating was being applied in this emissions unit.

(8) A record of the calculations showing the monthly volume-weighted average mass of VOC per volume of applied coating solids (kilograms of VOC per liter) performed in accordance with 40 CFR Part 60, Subpart MM shall be maintained.

(9) In order to demonstrate compliance with the PM, PM10, and PM2.5 Plantwide Applicability Limitations, the permittee shall maintain monthly records for coating overspray from the guide/primer coating line of the following information:

a. the usage of each coating, in gallons;

b. the coating density of each coating, in pounds per gallon;

c. the solids content of each coating (weight percent);

d. the transfer efficiency of each coating applied;

e. the downdraft/scrubber system control efficiency; and

f. the calculated particulate emissions from overspray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).

(10) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

(11) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII,, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. any monthly record indicating an exceedance of the 1.40 kg VOC/liter applied solids, as a monthly volume-weighted average (satisfies the reporting requirements of 40CFR Part 60.396(b) for NSPS emission limit deviations); and

b. any record showing that the downdraft/scrubber control was not in service when coating was applied in this emissions unit.

These quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any exceedance of the daily volume-weighted average of VOC per gallon of deposited solids and/or the daily volume-weighted average pounds of VOC/gallon of coatings, 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 notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

2.8 lb of VOC/gallon of coating minus water and exempt solvents; or 15.1 lb VOC/gallon of deposited solids, both as a daily volume-weighted average

<u>Applicable Compliance Method</u>:

Compliance with these VOC emission limitations for the prime/guide coat application shall be determined through the daily or monthly recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions. The VOC emission rate, pounds of VOC per gallon of coating solids deposited, and transfer efficiency shall be determined using the

"Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018).

b. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO_2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

c. Emission Limitation:

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

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).

d. Emission Limitation:

1.40 kg VOC/liter of solids applied as a monthly volume-weighted average

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the monthly recordkeeping requirements, as specified in Section d)(8).

e. Emission Limitation:

2.60 pounds particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this emission limitation shall be based on meeting the requirements for the downdraft/scrubber control system found in Sections c)(1), d)(7), and e)(1)b.

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).

f. 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 1,020 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).

g. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

8. K208, PA L1 Body Topcoat

Operations, Property and/or Equipment Description:

Line 1 topcoat A, B, and on-line repair with gas-fired makeup air and ovens

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO_2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; and 2.50 lb of VOC/hr. PE from coating overspray shall not exceed 8.72 lb/hr. See b)(2)a. and b)(2)b. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(C)(1), 3745-17-07(A)(1), and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO_2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO_2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in section d) contribute to the calculation of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the total VOC, NOx, CO, SO_2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 2.8 lb/gallon of coating excluding water and exempt solvents or 15.1 lb/gallon of deposited solids, either as a daily volume-weighted average.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from a stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
f.	OAC rule 3745-17-11(C)	See b)(2)d. below.
g.	40 CFR 60, Subpart MM	VOC emissions shall not exceed 1.47 kg/liter of applied coating solids, as a monthly volume-weighted average.
h.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The total overall VOC control efficiency for this emissions unit shall be equal to or greater than 9 percent, by weight, where,

total overall VOC control efficiency = (destruction removal efficiency) x (oven capture).

b. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1) 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.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b.;

iii. Section c)(1); and

iv. Section f)(1)b., f)(1)e. and f)(1)f.

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

c) Operational Restrictions

(1) The topcoat oven of this emissions unit shall be vented to a thermal incinerator and the permittee shall assume a 10 percent oven VOC capture rate for the purpose of determining capture efficiency for add-on emissions control and in quantifying VOC emissions from this emissions unit, and to demonstrate compliance with permitted mass emission limitations from the topcoat operations. In order to demonstrate compliance with permitted emissions and to quantify VOC emissions for Line 1 topcoat and on-line repair operations (K208), VOC capture efficiency shall be determined for add-on emissions control based on the following data, collected in accordance with OAC rule 3745-21-09(C)(4), using the following equation:

oven capture = (daily bake oven exhaust control credit in lb VOC/gal applied solids)/ (uncontrolled daily VOC emissions rate in lb VOC/gal applied solids) x 100%

as measured by the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." A rate of 10 percent shall be used unless monitoring or emission testing provides a more accurate capture efficiency estimate.

The permittee shall assume a 90 percent incineration VOC control for the purpose of determining destruction efficiency for add-on emissions control and in quantifying VOC emissions from this emissions unit, to demonstrate compliance. This percent destruction efficiency shall be adjusted if monitoring or emission testing provides a more accurate estimate for topcoat emissions.

(2) The permittee shall operate the downdraft/scrubber control system whenever spray coating is applied in this emissions unit.

(3) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with OAC rule 3745-21-09(C)(1)(a)(v), the permittee shall maintain records for the topcoat coating 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 factor:

a. the daily usage of each coating;

b. the VOC generated per gallon of each coating;

c. the volume solids content of each coating;

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

e. the daily weighted bake oven exhaust control credit.

The daily volume-weighted average for each day in a month may be calculated, recorded, and maintained at the end of each month as either:

a. the daily volume-weighted average of VOC per gallon of deposited solids; or

b. the daily volume-weighted average of VOC per gallon of coating minus water and exempt solvents.

(2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3), to the VOC Plantwide Applicability Limitation :

a. the name and identification of each coating, reducing solvent, or other material employed;

b. the VOC content of each coating, reducing solvent, or other material employed;

c. the number of gallons of each coating, reducing solvent, or other material employed;

d. the total uncontrolled VOC emissions from all coatings, reducing solvents, and/or other materials 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 coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b); and

e. the total controlled VOC emission rate from the topcoat operations for all coatings, reducing solvents, and other materials applied, calculated using the most recent capture and destruction efficiency test results for the oven and the incinerator, in pounds per month, i.e., [(d) x (100% - capture efficiency*) x (100% - destruction efficiency)].

*this would include results of capture testing from the booth to oven, and from the oven to the incinerator.

(3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, VOC Plantwide Applicability Limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-Coat Line 1
K206-PA Primer/Surfacer Line 1
K208- PA Topcoat Line 1
P201–PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-Line 1 Phosphate Coating
Z355-Line 2 Phosphate Coating

Any new emission or modified unit associated with the permittee's body painting operations

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.

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in Section d)(3) above:

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 applied (a) in the emissions units listed in Section d)(3), above, times each material's VOC content (b).

(5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC Plantwide Applicability 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 coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, and R003, and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), i.e., (c) x (d).

(6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102,R103, R003;

b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3);

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, recorded and calculated as per Section d)(5); and

d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units, in pounds or tons per month, i.e., (a) + (b) - (c).

(7) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the topcoat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance, or less than 1200 degrees Fahrenheit.

(8) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature of thermal incinerator when the topcoat oven is processing units. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the topcoat oven is processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated the emissions unit was in compliance, or below 1200 degrees Fahrenheit; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the topcoat oven is processing units.

(10) The permittee shall maintain records that document any time periods when the downdraft/scrubber control was not in service when spray coating was applied in this emissions unit.

(11) A record of the calculations showing the monthly volume-weighted average mass of VOC per volume of applied coating solids (kilograms of VOC per liter) performed in accordance with 40 CFR Part 60, Subpart MM shall be maintained.

(12) In order to demonstrate compliance with the PM, PM10, and PM2.5 Plantwide Applicability Limitations , the permittee shall maintain monthly records for coating overspray from the topcoat coating line of the following information:

a. the usage of each coating, in gallons;

b. the coating density of each coating, in pounds per gallon;

c. the solids content of each coating (weight percent);

d. the transfer efficiency of each coating applied;

e. the downdraft/scrubber system control efficiency; and

f. the calculate particulate emissions from overspray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).

(13) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

(14) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. any exceedance of the 1.47 kg VOC/liter applied solids, as a monthly volume-weighted average (satisfies the reporting requirements of 40 CFR Part 60.396(b) for NSPS emission limitation deviations);

b. all 3-hour blocks of time when the topcoat oven was processing units during which the average temperature within the thermal incinerator was below 1200 degrees Fahrenheit and more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance (Compliance with this reporting requirement also satisfies compliance with 40 CFR 60.7(c).); and

c. any record showing that the downdraft/scrubber control was not in service when spray coating was applied in this emissions unit.

These quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office, in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(2) The permittee shall notify the Ohio EPA, Central District Office, in writing, of any exceedance of the daily volume-weighted average of VOC per gallon of deposited solids and/or the daily volume-weighted average pounds of VOC per gallon of coatings, excluding water and exempt solvents emission limitations. 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 notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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:

2.8 lb VOC/gallon of coating minus water and exempt solvents, or
15.1 lb VOC/gallon of deposited solids, as a daily volume-weighted average

Applicable Compliance Method:

Compliance with these VOC emission limitations for the topcoat application shall be determined through daily or monthly recordkeeping requirements, as specified in Section d)(1), and emission testing requirements as specified in f)(1)f. Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions. The VOC emission rate, pounds of VOC per gallon of coating solids deposited, and transfer efficiency shall be determined using the "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

b. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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.. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

c. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.

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).

d. Emission Limitation:

1.47 kg VOC/liter of applied coating solids as a monthly volume-weighted average

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through the monthly recordkeeping requirements, as specified in Section d)(11).

e. Emission Limitation:

8.72 pounds PE/hr from coating overspray

Applicable Compliance Method:

Compliance with this emission limitation shall be based on meeting the requirements for the downdraft/scrubber control system found in Sections c)(2), d)(10), and e)(1)c.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).

f. Emission Limitation:

The total overall VOC control efficiency for this emissions unit shall be equal to or greater than 9 percent, by weight.

Applicable Compliance Method:

i. The permittee shall conduct emission testing to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. the following test methods shall be employed to demonstrate compliance with the VOC control efficiency requirements:

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

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

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

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

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

iv. The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

v. The results from the U.S. EPA's "Protocol" capture testing may be used in conjunction with the following equation to determine the overall capture efficiency:

Capture Efficiency = [(daily bake oven exhaust control credit in lb VOC/gas)/(uncontrolled daily VOC emission rate in lb VOC/gas)] x 100%

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

vii. 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).

viii. 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.

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

g. 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 1,020 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).

h. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -Window Install Lines: K221,K222

EU ID	Operations, Property and/or Equipment Description
K221	(K221) - (AF Line 1 Window Install and Off-line glass repair) Installation and repair of main glass and quarter glass using glass, primer, body primer, adhesives, misc. coatings and wiping solvents.
K222	(K222) - (AF Line 2 Window Install) Installation and repair of main glass and quarter glass using glass primer, body primer, adhesives, misc. coatings and wiping solvents.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3)	Organic compound/volatile organic compound (OC/VOC) emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed shall not exceed 18.1 tons per rolling, 12-month period.
b.	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.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	The usage of body primer in this emissions unit shall not exceed 10 gallons per day.
d.	OAC rule 3745-21-09(U)(1)(i)	When applying adhesives to metal, the VOC content of any adhesive employed in this emission unit shall not exceed 3.0 lb/gallon, excluding water and exempt solvents.
e.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

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

i. Section b)(1)a.;

ii. Section d)(2)b.;

iii. Section e)(3); and

iv. Section f)(1)c.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month to demonstrate compliance with the VOC plantwide applicability limitation:

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

b. the VOC content of each coating, glass and body primer, adhesive, and wiping solvent (excluding water and exempt solvents), when applied to metal;

c. the OC/VOC content of each coating, glass and body primer, adhesive, and wiping solvent, when applied to non-metal; and

d. the number of gallons of each coating, glass and body primer, adhesive, and wiping solvent employed.

(2) The permittee shall collect and record the following information each month to demonstrate compliance with the VOC plantwide applicability limitation:

a. the total OC/VOC emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed, in pounds or tons; and

b. the rolling, 12-month OC/VOC emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed, in tons.

(3) 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.

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing an exceedance of the 10 gallon per day coating usage restriction. 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.

(2) The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing the application of noncomplying adhesives (exceeding 3.0 lb VOC/gal, as applied) to metal. 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 submit quarterly deviation (excursion) reports that identify any exceedances of the rolling, 12-month OC/VOC emission limitation for emissions units K221 (Line 1 with off-line repair) and K222 (Line 2).

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the emission limitations specified in Section b)(1) shall be demonstrated in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section d)(1).

b. Emission Limitation:

The usage of body primer in each emissions unit shall not exceed 10 gallons per day.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section d)(3).

c. Emission Limitation:

Organic compound/volatile organic compound (OC/VOC) emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed in each emissions unit shall not exceed 18.1 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the records required pursuant to Section d)(2).

Formulation data from the manufacturer(s) of the coatings, glass and body primers, adhesives, and wiping solvents or analyses performed in accordance with 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the OC content of each material applied.

d. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

10. K224, Miscellaneous Sealers and Adhesive Application

Operations, Property and/or Equipment Description:

Miscellaneous application of sealers and adhesives to metal and non-metal parts, on Lines 1 and 2

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-21-09(U)(1)(d)	The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents. See b)(2)a below.
c.	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 VOCemissions from this facility as specified in B.3.

(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 plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirement shall be considered void:

i. Section b)(1)a.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the adhesive and sealer coating materials employed in this emissions unit:

a. The name and company identification of each material applied;

b. The VOC content of each material, as applied;

c. The number of gallons of each material, as applied; and

d. The total VOC emission rate from all materials applied, in pounds per month.

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 3.5 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.

(2) These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the Standard Terms and Conditions.

f) Testing Requirements

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

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

The VOC content of the coating shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

11. K225, AF Miscellaneous Corrosion Protection/Lubricant Application

Operations, Property and/or Equipment Description:

Miscellaneous application of corrosion protectants and lubricants on Lines 1 and 2

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The organic compound (OC) content of the materials employed in this emissions unit shall not exceed 6.5 pounds OC per gallon when coating non-metal. The volatile organic compound (VOC) content of the materials employed in this emissions unit shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents, when coating metal. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-21-09(U)(1)(d)	The volatile organic compound (VOC) content of the materials employed in this emissions unit shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents, when coating metal. See b)(2)a. below.
c.	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)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		contribute to the calculation of the total VOC emissions from this facility as specified in B.3.

(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 plant-wide applicability limit from the requirement to be subject to BAT requirements, the following requirements shall be considered void:

i. Section b)(1)a;

ii. Section d)(2);

iii. Section e)(2); and

iv. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the corrosion protectants and lubricants applied to metal in this emissions unit:

a. The name and company identification of the material applied;

b. The VOC content of each material, as applied;

c. The number of gallons of each material, as applied; and

d. The total VOC emission rate from all materials applied, in pounds per month.

(2) The permittee shall collect and record the following information each month for the corrosion protectants and lubricants applied to non-metal in this emissions unit:

a. The name and company identification of the material applied;

b. The OC content of each material, as applied;

c. The number of gallons of each material, as applied; and

d. The total OC emission rate from all materials applied, in pounds per month.

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 3.5 lb VOC/gal, excluding water and exempt solvents, when applied to metal. 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 any monthly record showing an exceedance of the coating content limit of 6.5 lb OC/ gallon when applied to non-metal.

(3) All quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office as required in the Standard Terms and Conditions of this permit.

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:

The OC content of the materials employed in this emissions unit shall not exceed 6.5 pounds OC/gal when coating non-metal.

Applicable Compliance Method:

Compliance with the OC content limit may be determined through monthly record keeping specified in Section d)(2) above. Formulation data from the manufacturer or U.S. EPA Method 24 shall be used to determine the VOC content.

b. Emission Limitation:

The VOC content of the materials employed in this emissions unit shall not exceed 3.5 pounds VOC/gal, excluding water and exempt solvents, when coating metal.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

12. K226, AF Miscellaneous Metal Painting

Operations, Property and/or Equipment Description:

Miscellaneous application of paints and primers, to metal and non-metal on Lines 1 and 2

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The total coating usage in this emissions unit shall not exceed 10 gallons per day. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	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.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a below.

(2) Additional Terms and Conditions

a. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

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

i. Section b)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) When coating metal parts, the permittee shall collect and record the following information each day for the coating line:

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.

(2) The permittee shall collect and record the following information each month for the coating and cleanup materials employed in this emissions unit:

a. The name and company identification of the coating applied;

b. The VOC content of each coating, as applied;

c. The number of gallons of each coating, as applied;

d. The total VOC emission rate from all coatings applied, in pounds per month;

e. The name and identification of each cleanup material employed;

f. The number of gallons of each cleanup material employed;

g. The VOC content of each cleanup material, in pounds per gallon; and

h. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

e) Reporting Requirements

(1) The permittee shall notify the Central District Office in writing of any daily record showing that the ten gallon coating limit was exceeded for this emissions unit. 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.

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>Usage Limitation</u>:

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance with this limit may be determined through the daily record keeping specified in Section d)(1) above.

g) Miscellaneous Requirements

(1) None.

13. Emissions Unit Group -Wheel Well Blackout: K227,K228

EU ID	Operations, Property and/or Equipment Description
K227	Line 1 wheel well blackout
K228	Line 2 wheel well blackout

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The VOC content of the coatings employed in the wheel well, blackout application shall not exceed 0.62 pounds of VOC per gallon, as applied. Particulate emissions (PE) from coating/blackout overspray shall not exceed 0.551 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, PM, PM10, and PM2.5 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, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(U)(1)(d)	Volatile organic compound (VOC) emissions shall not exceed 3.5 lb per gallon of coating, excluding water and exempt solvents.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(C)	See b)(2)b. below.
f.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

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

i. Section b)(1)a.; and

ii. Section f)(1)b.

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

c) Operational Restrictions

(1) The permittee shall operate the fabric filter system whenever this emissions unit is in operation.

(2) The cleanup material for the blackout operations is mostly water. Any miscellaneous cleanup or purge materials used for K227 and K228 shall be tracked, monitored, and reported as per the Paint Department's overall cleanup and purge material requirements.

(3) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each coating employed in the wheel well blackout process; and

b. the VOC content of each coating, as applied.

(2) The permittee shall collect and record the following information each month from wheel well blackout coatings applied in emissions units K227 and K228 together:

a. the name and identification of each blackout coating employed*;

b. the VOC content of each blackout coating, as applied, in pounds per gallon*;

c. the number of gallons of each blackout coating employed (gal/month); and

d. the total VOC emissions from all blackout process coatings employed in emission units K227 and K228 together, in pounds or tons per month, i.e., summation of the products of each coating's usage, times each coating's VOC content (b) x (c).

* records are satisfied in Section d)(1).

(3) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

(5) In order to demonstrate compliance with the PM, PM10, and PM2.5 Plantwide Applicability Limitations, the permittee shall maintain monthly records for coating overspray from these emission units:

a. the usage of each coating, in gallons;

b. the coating density of each coating, in pounds per gallon;

c. the solids content of each coating (weight percent);

d. the transfer efficiency of each coating applied;

e. the filter efficiency; and

f. the calculated particulate emissions from overspray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Central District Office in writing of any monthly record showing the use of noncomplying blackout coatings, exceeding 0.62pounds of VOC per gallon, as applied or 3.5 pounds of VOC per gallon, 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 any record showing that the dry filtration system was not in service when the emissions unit was in operation using a spray coating application. 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 notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

0.62 lb VOC/gallon for any wheel well blackout coating, as applied.

Volatile organic compound (VOC) emissions shall not exceed 3.5 lb per gallon of coating, excluding water and exempt solvents.

<u>Applicable Compliance Method</u>:

Compliance with this VOC limit shall be determined through monthly recordkeeping, as specified in Section d)(1), of each blackout coating applied and the volatile organic compound content of each. Formulation data from the coating's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

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

0.551 pound of particulate emissions per hour from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system found in Sections c)(1), d)(3), and e)(2). 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:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

14. K235, Line 2 E-Coat

Operations, Property and/or Equipment Description:

Line 2 E-coat

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The VOC content of the coatings employed shall not exceed 0.75 lb/gallon, as applied, excluding water and exempt solvents (free solvent). See b)(2)b. below. Emissions from natural gas usage in emissions units K235 through K238 shall not exceed: 0.82 lb PE (filterable)/hr; 0.26 lb SO2/hr; 43.23 lb NOx/hr; 36.31 lb CO/hr; and 2.38 lb VOC/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-32(A)(6), 3745-21-09(C)(1)(a), and 40 CFR Part 60, Subpart MM. See b)(2)c., b)(2)d., b)(2)f. and b)(2)g. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(C)(1)(a)	See b)(2)h. below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	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 3745-31-05(A)(3) and OAC rule 3745-21-09(C)(1)(a).
e.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. This emissions unit includes a series of open, uncontrolled tanks (baths) consisting of a mix of water, solvent, resin and paste. Vehicle body frames are dipped into the tanks and then transferred to a curing oven. The curing oven is vented to and controlled by a thermal incinerator. The uncontrolled emissions from the tanks and transfer area released prior to entering the oven are referred to as “free solvent” emissions for the purposes of this permit. The controlled emissions from the oven curing process are referred to as “cure volatiles” for the purposes of this permit.

b. This emissions unit shall not exceed the following:

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

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

(b) Total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas, as a monthly volume-weighted average.

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

(a) VOC emissions from the free solvent shall not exceed 0.7 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).

c. The RTO controlling the e-coat oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

d. The emission limitation specified under OAC rule 3745-31-05(A)(3) is based on an assumed oven capture efficiency of 95%, by weight, as estimated in the permit to install application and shall be used for emissions calculations until testing is conducted. The capture efficiency may be adjusted based on the results of testing required in f)(1)c. below.

e. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this permit under emissions units K201, K206, K208, R003, R102, and R103**.**

f. The hourly natural gas emission limitations are based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to establish compliance with these limitations.

g. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the permit application. 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) above and the

Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

h. This emissions unit shall not exceed the following:

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

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

RT = Te/Le

where:

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

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

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

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

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

i. Section b)(1)a.;

ii. Section b)(2)b., b)(2)c., b)(2)d., b)(2)f. and b)(2)g;

iii. Section c)(1);

iv. Section e)(1)b., e)(1)c., e)(1)d.; and

v. Section f)(1)b. through f)(1)d.

c) Operational Restrictions

(1) The permittee shall operate the RTO 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 operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the e-coat oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions tests that demonstrated the emissions unit was in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the e-coat oven is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the e-coat oven was processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the e-coat oven was processing units

(3) The permittee shall collect and maintain monthly records which contain the following information for materials added to the e-coat process for the purpose of determining compliance with VOC emission limitation, in lb/gallon:

a. the name and identification of each coating and solvent added to the EDP system; and

b. the VOC content of each coating and solvent (excluding water and exempt solvents), as added to the EDP system, in lb VOC/gal.

(4) The permittee shall collect and maintain monthly records which contain the following information for materials added to the EDP system for the purpose of determining the contribution of coatings (resin and paste) and solvent employed in this emissions unit and to determine compliance with the VOC Plantwide Applicability Limitation and compliance with the pound of VOC/gas limitation specified in (b)(1) above):

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

b. the VOC content of each coating (free solvent) and solvent employed, in pounds per gallon;

c. the number of gallons of each coating and solvent employed, in gallons;

d. the total VOC emissions from all coatings and solvent employed, (i.e., the summation of the materials employed ("b" x "c");

e. the volume solids content of each coating added to the system;

f. the amount of solids, in gallons ("c" x "e" x transfer efficiency);

g. the monthly volume-weighted average VOC content of the coatings (free solvent), as applied ("d" / "f");

h. the VOC content of the cure volatiles of each coating employed**, in pounds per gallon;

i. the total uncontrolled cure volatile VOC emissions, in pounds per month ("h" x "c");

j. the total VOC emissions (free solvent + controlled cure volatiles), in pounds or tons per month, using the most recent test results ("d" + "i" x [1 – oven capture efficiency x thermal incinerator destruction efficiency]);

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

l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (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

m. the calculated VOC emission limitation according to the calculation in b)(2)b.ii above if the turnover ratio is greater than or equal to 0.040 and less than 0.160.

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

Cure Volatiles = Total VOC – Free Solvent.

(5) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

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

(7) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in d)(1) above;

b. all records showing an exceedance of the 0.75 lb VOC/gallon, as applied, content limitation, excluding water and exempt solvents (free solvent).;

c. all records showing that the RTO was not in service when the e-coat oven was processing units;

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

e. any exceedance of the applicable total VOC emission rate, in pounds per gallon of applied solids, specified in b)(2)b. or b)(2)h. above.

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

(2) The permittee shall submit deviation (excursion) reports to Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

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

VOC emissions from the free solvent shall not exceed 0.7 lb/gallon of applied solids (gas), as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 lb/gas or 1.4 lb/gas, as a monthly volume-weighted average.

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

VOC emissions from the free solvent shall not exceed 0.7 x $350^{(0.160- RT)}$ lb/gas, as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed 1.0 x $350^{(0.160- RT)}$ lb/gas or 1.4 × $350^{(0.160-RT)}$, 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)(4) above.

b. Emission Limitations:

Emissions from natural gas from emissions unitsK235-K238 combined:

0.82 lb PE (filterable)/hr;
0.26 lb SO2/hr;
43.23 lb NOx/hr;
36.31 lb CO/hr;
2.38 lb VOC/hr

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 Methods 7E for NOx, 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. Emission Limitation:

The RTO controlling the e-coat oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

i. The permittee shall conduct emission testing to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:

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

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

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

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

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

iv. The capture efficiency of the e-coat oven controlling cure volatiles shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995.

v. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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

vii. 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).

viii. 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.

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

d. Emission Limitations:

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

Applicable Compliance Method:

Compliance with this emission limitation for the E-coat dip tank shall be determined through the monthly recordkeeping as specified in d)(3) Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. U.S. EPA Method 24 shall also be used to determine the VOC and water contents of the E-coat mix in the electro deposition dip tank, if required. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

e. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

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

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

g) Miscellaneous Requirements

(1) None.

15. K236, Line 2 Primer/Surfacer

Operations, Property and/or Equipment Description:

Line 2 primer/surfacer

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 9.5 lb/gallon of applied solids (gas), as a daily volume weighted average when employing solvent borne coatings and 5.5 lb/gas, as a daily volume weighted average when employing waterborne coatings. Particulate emissions (PE) from coating overspray shall not exceed 2.40 lb/hr. Emissions from natural gas usage in emissions units K235 through K238 shall not exceed: 0.82 lb PE (filterable)/hr; 0.26 lb SO2/hr; 43.23 lb NOx/hr; 36.31 lb CO/hr; and 2.38 lb VOC/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-32(A)(6), 3745-17-07(A)(1), 3745-21-09(C)(1)(c)(a)(v), and 40 CFR Part 60, Subpart MM. See b)(2)a., b)(2)b., b)(2)c., b)(2)e. and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		b)(2)g. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from a stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
e.	OAC rule 3745-17-11(C)	See b)(2)i. below.
f.	OAC rule 3745-21-09(C)(1)(a)(v)	VOC emissions shall not exceed 15.1 lb/gallon of deposited solids, as a daily volume weighted average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See Section b)(2)f. below.
g.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.40 kg/liter of applied coating solids, as a monthly volume weighted average from the primer/surfacer coating operation.
h.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the

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

(2) Additional Terms and Conditions

a. The primer/surfacer coating operation consists of two lines, each including a booth with auto and manual zones, oven and cooling area. The VOC emissions from the two ovens are controlled by a regenerative thermal oxidizer (RTO).

b. The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

c. The emission limitation under OAC rule 3745-31-05(A)(3) is based on an assumed overall control efficiency (i.e. destruction removal efficiency of RTO x primer/surface oven capture efficiency) of 9 percent, by weight, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted. This efficiency may be adjusted based on the testing required in Section f)(1)d. below.

d. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this permit under emissions units K201, K206, K208, R003, R102, and R103**.**

e. The hourly natural gas emission limitations and hourly PE limitation are based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to establish compliance with these limitations.

f. 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 (K235) and before the topcoat operation (K237).

g. Additional natural gas combustion sources (no individual burner greater than 10MMBTU/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the permit application. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

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

i. Section b)(1)a.;

ii. Section b)(2)b., b)(2)c., b)(2)e., b)(2)g.;

iii. Section c)(2);

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

v. Section f)(1)b. through f)(1)d.

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

c) Operational Restrictions

(1) The permittee shall operate the underbooth scrubber whenever spray coating is being applied in this emissions unit.

(2) The permittee shall operate the RTO whenever the ovens are processing units.

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

(4) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The average combustion temperature within the RTO, for any 3-hour block of time when the ovens are processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit is in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the ovens are processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the ovens were processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated ovens were processing units.

(3) The permittee shall maintain records that document any time periods when the underbooth scrubber was not in service when spray coating was being applied in this emissions unit.

(4) The permittee shall maintain records for the primer/surfacer operation that will enable the permittee to calculate the VOC emission rate, in lb/gas (as a daily and monthly volume weighted average) in order to demonstrate compliance with the following emission limitations: 9.5 lb/gas for all solventborne coatings applied, as a daily volume weighted average, 5.5 lb/gas for all waterborne coatings applied, as a daily volume weighted average and 1.40 kg/liter of applied coating solids, as a monthly weighted average.

The monitoring, recordkeeping and calculations shall be performed in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" and any subsequent revisions thereof to determine daily volume weighted average or in accordance with 40 CFR 60, Subpart MM to determine monthly volume-weighted average.

The permittee shall calculate the VOC emission rates for the primer/surfacer operation in pounds of VOC per gallons of applied solids using the control and destruction efficiency for the control equipment, as determined through the most recent emission test that demonstrated that the emissions unit was in compliance.

(5) The permittee shall collect and maintain the following records on a monthly basis:

a. the name and identification of each coating employed;

b. the number of gallons of each coating employed;

c. the VOC content of each coating employed;

d. the total uncontrolled monthly VOC emission rate in lb or tons VOC/month; and

e. the total controlled monthly VOC emission rate in lb or tons VOC/month, based on the control efficiency determined through the testing required in Section f)(1)d.

(6) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K236, K237 and P342-P344:

a. the total summation of controlled PE emissions from coating overspray and sanding in the Line 2 emission units combined, in tons PE/month using the

facility's most recent transfer efficiency determination per U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations".

(7) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

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

(9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in d)(1) above;

b. all records showing an exceedance of the controlled VOC emission rate of 9.5 lb/gas, as a daily volume-weighted average for solventborne coatings applied and/or 5.5 lb/gas, as a daily volume weighted average for waterborne coatings applied;

c. all records showing an exceedance of the controlled VOC emission rate of 1.40 kg/liter of applied solid, as a monthly volume-weighted average (this reporting requirement also satisfies reporting required by 40 CFR 60.7 and 40 CFR 60 Subpart MM.);

d. all records showing that underbooth scrubber was not in service when spray coating was applied in this emissions unit; and

e. all records showing that the RTO was not in service when the oven is processing units.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(2) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

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

a. Emission Limitations:

The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 9.5 lb/gallon of applied solids (gas), as a daily volume weighted average when employing solventborne coatings and 5.5 lb/gas, as a daily volume weighted average when employing waterborne coatings.

1.40 kg/liter of applied solids, as a monthly volume weighted average, from coating operations

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(4) above.

b. Emission Limitation:

2.4 lb PE/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the underbooth scrubber found in Sections c)(1), d)(3), and e)(1)d. above. 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 Limitations:

Emissions from natural gas from emissions units K235-K238 combined:

0.82 lb PE (filterable)/hr;
0.26 lb SO2/hr;
43.23 lb NOx/hr;
36.31 lb CO/hr;
2.38 lb VOC/hr

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 Methods 7E for NOx, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO2. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

i. The permittee shall conduct emission testing to determine the destruction efficiency of the RTO (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:

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

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

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

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

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

iv. The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the

request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

v. The results from the U.S. EPA's "Protocol" capture testing may be used in conjunction with the following equation to determine the overall capture efficiency:

$$\text{Capture Efficiency} = \frac{\text{(daily bake oven exhaust control credit in lb VOC/gas)}}{\text{(uncontrolled daily VOC emission rate in lb VOC/gas)}} \times 100\%$$

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

vii. 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).

viii. 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.

ix. 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.

e. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-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).

f. 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 1,020 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).

g. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) None.

16. K237, Line 2 Topcoat

Operations, Property and/or Equipment Description:

Line 2 topcoat

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 8.0 lb/gallon of applied solids (gas), as a daily volume weighted average. Particulate emissions (PE) from coating overspray shall not exceed 2.40 lb/hr. Emissions from natural gas usage in emissions units K235 through K238 shall not exceed: 0.82 lb PE (filterable)/hr; 0.26 lb SO2/hr; 43.23 lb NOx/hr; 36.31 lb CO/hr; and 2.38 lb VOC/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-32(A)(6), 3745-17-07(A)(1), 3745-21-09(C)(1)(c), and 40 CFR Part 60, Subpart MM. See b)(2)a., b)(2)b., b)(2)c., b)(2)e. and b)(2)f. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissionsfrom a stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
e.	OAC rule 3745-17-11(C)	See b)(2)h. below.
f.	OAC rule 3745-21-09(C)(1)(c)	VOC emissions shall not exceed 15.1 lb/gallon of deposited solids, as a daily volume weighted average. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	NSPS - 40 CFR Part 60, Subpart MM	VOC emissions shall not exceed 1.47 kg/liter of applied coating solids, as a monthly volume weighted average from the topcoat operation.
h.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The topcoat coating operation consists of two lines, each including a basecoat area with a heated flashoff and a clearcoat area followed by a topcoat curing oven. The VOC emissions from the two topcoat curing ovens and two clearcoat booth auto zones are controlled by a regenerative thermal oxidizer (RTO).

b. The RTO controlling the topcoat curing ovens and clearcoat booth auto zones shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

c. The emission limitation under OAC rule 3745-31-05(A)(3) is based on an assumed overall control efficiency of 42 percent by weight (i.e.; sum of controlled T/C VOC emissions/sum of uncontrolled T/C VOC emissions), as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted. This efficiency may be adjusted based on the testing required in Section f)(1)d. below.

d. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this permit under emissions units K201, K206, K208, R003, R102, and R103**.**

e. The hourly natural gas emission limitations and hourly PE limitation are based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to establish compliance with these limitations.

f. Additional natural gas combustion sources (no individual burner greater than 10MMBTU/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the permit application. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

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

i. Section b)(1)a.;

ii. Section b)(2)b., b)(2)c., b)(2)e., b)(2)f.;

iii. Section c)(2);

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

v. Section f)(1)b. through f)(1)d.

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

c) Operational Restrictions

(1) The permittee shall operate the underbooth scrubber whenever spray coating is being applied in this emissions unit.

(2) The permittee shall operate the RTO whenever spray coating is being applied in this emissions unit.

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

(4) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit is in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and

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

(3) The permittee shall maintain records that document any time periods when the underbooth scrubber was not in service when spray coating was being applied in this emissions unit.

(4) The permittee shall maintain records for the topcoat process that will enable the permittee to calculate the VOC emission rate, in lb/gas (as a daily and monthly volume weighted average) in order to demonstrate compliance with the following emission limitations: 8.0 lb/gas for all coatings, as a daily volume weighted average and 1.47 kg/liter of applied coating solids, as a monthly weighted average.

The monitoring, recordkeeping and calculations shall be performed in accordance with U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations" to determine daily volume weighted average or in accordance with 40 CFR 60, Subpart MM to determine monthly volume-weighted average.

The permittee shall calculate the VOC emission rates for the topcoat operation in pounds of VOC per gallons of applied solids using the control and destruction efficiency for the control equipment, as determined through the most recent emission test that demonstrated that the emissions unit was in compliance.

(5) The permittee shall collect and maintain the following records on a monthly basis for the purpose of determining compliance with the VOC Plantwide Applicability Limitation :

a. the name and identification of each coating employed;

b. the number of gallons of each coating employed;

c. the VOC content of each coating employed;

d. the total uncontrolled VOC emission rate in lb or tons VOC/month; and

e. the total controlled VOC emission rate in lb or tons VOC/month, based on the control efficiency determined through the testing required in Section f)(1)d.

(6) The permittee shall maintain the following records each calendar month, for Line 2, emissions units K236, K237 and P342-P344 for purposes of demonstrating compliance with the PM, PM10, and PM2.5 Plantwide Applicability Limitations:

a. the total summation of controlled PE emissions from coating overspray and sanding in the Line 2 emission units combined, in tons PE/month using the facility's most recent transfer efficiency determination per U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobiles and Light Duty Truck Topcoat Operations".

(7) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

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

(9) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in d)(1) above;

b. all records showing an exceedance of the controlled VOC emission rate of 8.0 lb/gas, as a daily volume-weighted average;

c. all records showing an exceedance of the controlled VOC emission rate of 1.47 kg/liter of applied solid, as a monthly volume-weighted average (this reporting requirement also satisfies reporting required by 40 CFR 60.7 and 40 CFR 60 Subpart MM);

d. all records showing that the underbooth scrubber was not in service when spray coating was applied in this emissions unit; and

e. all records showing that the RTO was not in service when spray coating was applied in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(2) The permittee shall submit deviation (excursion) reports to Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

The controlled volatile organic compound (VOC) emission rate from this emissions unit shall not exceed 8.0 lb/gallon of applied solids (gas), as a daily volume weighted average. 1.47 kg/liter of applied solids, as a monthly volume weighted average, from coating operations

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(4) above.

b. Emission Limitation:

2.40 lb PE/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the underbooth scrubber control system found in Sections c)(1), d)(3), and e)(1)d. above. 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 Limitations:

Emissions from natural gas from emissions units K235-K238 combined:

0.82 lb PE (filterable)/hr;
0.26 lb SO2/hr;
43.23 lb NOx/hr;
36.31 lb CO/hr;
2.38 lb VOC/hr

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 NOx, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO2. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitation:

The RTO controlling the topcoat curing ovens and clearcoat booth auto zones shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

i. The permittee shall conduct emission testing to determine the destruction efficiency of the RTO (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:

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

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

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

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

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

iv. The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

v. The results from the U.S. EPA's "Protocol" capture testing may be used in conjunction with the following equation to determine the overall capture efficiency:

$$\text{Capture Efficiency} = \frac{\text{(daily bake oven exhaust control credit in lb VOC/gas)}}{\text{(uncontrolled daily VOC emission rate in lb VOC/gas)}} \times 100\%$$

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

vii. 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).

viii. 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.

ix. 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.

e. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-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).

f. 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 1,020 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).

g. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) None.

17. K238, Line 2 Sealer/Deadener/LASD

Operations, Property and/or Equipment Description:

Line 2 sealer/deadener and liquid-applied sound deadener

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the sealer/deadener employed in this emissions unit shall not exceed 0.30 lb/gallon. The VOC content of the liquid applied sound deadener (LASD) employed in this emissions unit shall not exceed 0.75 lb/gallon. Emissions from natural gas usage in emissions units K235 through K238 shall not exceed: 0.82 lb PE (filterable)/hr; 0.26 lb SO2/hr; 43.23 lb NOx/hr; 36.31 lb CO/hr; and 2.38 lb VOC/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-32(A)(6) and 3745-21-09(U). See Sections b)(2)a., b)(2)b., b)(2)c., b)(2)e., b)(2)f. and b)(2)g. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(U)	VOC emissions shall not exceed 3.0 lb/gallon, excluding water and exempt solvent materials. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The sealer/deadener coating operation consists of material application areas and sealer oven. The VOC emissions from the sealer oven are controlled by a regenerative thermal oxidizer (RTO).

b. The RTO controlling the sealer oven shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

c. The emission limitation under OAC rule 3745-31-05(A)(3) is based on an assumed overall control efficiency (i.e., destruction removal efficiency of RTO x sealer oven capture efficiency) of 71% by weight for sealer & deadener and 90% by weight for LASD, as estimated in the permit to install application and shall be used for all emission calculations until testing is conducted. This efficiency may be adjusted based on the testing required in Section f)(1)c. below.

d. All cleanup and purge materials associated with this emissions unit are permitted through terms and conditions in this permit under emissions units K201, K206, K208, R003, R102, and R103**.**

e. The hourly natural gas emission limitations are based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to establish compliance with these limitations.

f. The 0.30 lb VOC/gallon emission limitation for sealer/deadener and the 0.75 lb VOC/gallon for LASD materials specified under OAC rule 3745-31-05(A)(3) is based upon the use of compliant coatings as denoted in OAC rule 3745-21-09(B)(3)(f).

g. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in Line 2 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 the 440.9 MMBtu/hr specified in the permit application. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit and the Ohio EPA, Central District Office is notified of installation in writing within 30 days of operation startup.

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

i. Section b)(1)a.;

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

iii. Section c)(1);

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

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

c) Operational Restrictions

(1) The permittee shall operate the RTO whenever the 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 operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The average combustion temperature within the RTO, for any 3-hour block of time when the oven is processing units, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit is in compliance.

(2) The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the combustion temperature of the RTO when the oven is processing units. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the oven is processing units, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit is in compliance; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the oven is processing units.

(3) The permittee shall collect and record the following information each month for the sealer/deadener and LASD applications:

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

b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lb/gallon.

(4) The permittee shall collect and maintain the following records on a monthly basis for purposes of determining compliance with the VOC Plantwide Applicability Limitation:

a. the name and identification of each coating employed;

b. the number of gallons of each coating employed;

c. the VOC content of each coating employed, in lb/gallon;

d. the total uncontrolled VOC emission rate in lb or tons VOC/month; and

e. the total controlled VOC emission rate in lb or tons VOC/month, based on the control efficiency determined through the testing required in Section f)(1)c.

(5) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

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

(7) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified in d)(1) above; and

b. all records showing that the RTO was not in service when the oven is processing units.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(2) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(3) The permittee shall submit deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the applicable VOC emission rates of 0.30 lb/gal for sealer/deadener materials or 0.75 lb/gal for LASD materials or 3.0 lb/gallon, excluding water and exempt solvents materials . Each report, including a copy of such record, shall be submitted within 30 days following the month in which the exceedance occurs.

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

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>:

0.30 lb VOC/gal for sealer/deadener materials and 0.75 lb VOC/gal for LASD materials 3.0 lb/gallon, excluding water and exempt solvent materials.

Applicable Compliance Method:

Compliance may be determined by the recordkeeping requirements specified in Section d)(3) above.

b. Emission Limitations:

Emissions from natural gas from emissions units K235-K238 combined:

0.82 lb PE (filterable)/hr;
0.26 lb SO2/hr;
43.23 lb NOx/hr;
36.31 lb CO/hr;
2.38 lb VOC/hr.

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 NOx, Method 10 for CO, Methods 25, or 25A for VOC, Method 5 for particulate and Method 6C for SO2. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

c. Emission Limitation:

The RTO controlling the ovens shall operate at a minimum VOC destruction efficiency of 95 percent, by weight or a maximum outlet concentration of 10 ppm, as propane.

Applicable Compliance Method:

i. The permittee shall conduct emission testing to determine the destruction efficiency of the RTO (i.e., the percent reduction in mass emissions between inlet and outlet). The permittee shall also determine the VOC capture efficiency for this emissions unit.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. The following test methods shall be employed to demonstrate compliance with the total VOC control efficiency:

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

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

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

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

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

iv. The capture efficiency shall be determined using U.S. EPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". The capture efficiency shall be determined using the methods described in the "Protocol", or the permittee may request to use an alternative U.S. EPA-approved test method with prior approval from the Ohio EPA, Central District Office. The Ohio EPA, Central District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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

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.

d. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) None.

18. K239, Paint Shop Polish Coating Lines 1 and 2

Operations, Property and/or Equipment Description:

Body Paint Line 1 and Line 2 Polish Operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions from the polish operations shall not exceed 4.8 lb/gallon, including water and exempt solvents. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(F), as effective 12/01/06 (to avoid BAT requirements)	Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr. See b)(2)b. below.
d.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC emissions apply 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.

(2) Additional Terms and Conditions

a. The polish operation consists of polish application in the repair line, main line, and topcoat inspection areas in the Body Paint Line 1 and Line 2 coating lines. VOC emissions from the polish operations are not controlled.

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

i. Section b)(1)a., b)(1)b., b)(1)c.;

ii. Section b)(2)b.;

iii. Section e)(1); and

iv. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following informationon a monthly basis for this emissions unit:

a. the name and identification of each polish material;

b. the VOC content of each polish material, in pounds per gallon or percent by weight, including water and exempt solvent

c. the number of gallons or pounds of each polish material employed;

d. the calculated total VOC emissions from all polish materials employed, in pounds per month; and

e. the total annual VOC emissions from this emissions unit.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any records showing the use of a polish material that exceeds 4.8 lb VOC/gallon, including water and exempt solvents.

These quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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 Limitations:

4.8lb VOC/gallon, including water and exempt solvent(as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

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

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) None.

19. K240, LASD Line 1

Operations, Property and/or Equipment Description:

Application of liquid applied sealer/deadener using automatice (LASD Line 1)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of the liquid applied sound deadening (LASD) employed in this emissions unit shall not exceed 0.18 lb/gallon. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	OAC rule 3745-21-09(U)	VOC emissions from coatings shall not exceed 3.0 pounds per gallon (lb/gal), excluding water and exempt solvent materials The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	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.
d.	40 CFR Part 63, Subpart IIII (63.3091 through 63.3164)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)c. below.

(2) Additional Terms and Conditions

a. Emissions unit K240 consists of robotic material applicators, associated material storage and transfer equipment and shares the primer-surfacer/LASD oven with K206.

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

i. Section b)(1)a.

c. 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 operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

(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 for this emissions unit to demonstrate compliance with the VOC Plantwide Applicability Limitation:

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

b. the VOC content of each coating as applied, in lb/gallon;

c. the number of gallons of each coating employed; and

d. the total VOC emissions from all coating materials employed, in pounds or tons, 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).

(2) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

(3) 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 deviation (excursion) reports to the Ohio EPA, Central District Office, that identify all records showing an exceedance of the applicable VOC emission rate of 0.18 lb/gal or 3.0 lb/gal. Each report, including a copy of such record, shall be submitted within 30 days following the month in which the exceedance occurs.

(2) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

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

(4) 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>:

0.18 lb VOC/gal

VOC emissions from coatings shall not exceed 3.0 pounds per gallon (lb/gal), excluding water and exempt solvent materials

<u>Applicable Compliance Method</u>:

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

b. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of coating materials employed in this emissions unit.

(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.

20. Emissions Unit Group -Main Body Welding Lines: P004,P330

EU ID	Operations, Property and/or Equipment Description
P004	Weld Line 2: robotic & manual MIG & resistance welding, solder, brazing, sealer application, and miscellaneous organic use in welding
P330	Weld Line 1: robotic & manual MIG & resistance welding, solder, brazing, sealer application, and miscellaneous organic use in welding

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

(1) b)(1)d. and d)(5)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, PM, PM10, and PM2.5 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, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
b.	OAC rule 3745-31-05(A)(3)	MIG welding and brazing: Fugitive particulate emissions shall not exceed 0.26 lb/hr from Weld Line 1 & Line 2 together Anti-spatter materials and cleaning solutions shall not exceed 4.3 lb OC/gal. See c)(1) below.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	Miscellaneous sealers/sealants and quality marker coating usage: Use of no more than 10 gallons per day of miscellaneous *sealers/sealants and quality marker coatings
d.	ORC 3704.03(F)(3)(c) and F(4)	See the Facility-Wide Terms and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Toxic air contaminant statute)	Conditions and d)(5) below.
e.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

*These sealers and sealants are not the same materials, nor the same application, as those permitted for use in emission units P005 and P200.

(2) Additional Terms and Conditions

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

i. Section b)(1)b.;

ii. Section c)(1);

iii. Section d)(1), d)(4);

iv. Section e)(1), e)(3); and

v. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall minimize or eliminate visible particulate emissions through the installation and operation of collection hoods and fans at the point of emissions from the primary MIG welding. This collection system shall be vented to a baghouse having a collection efficiency of 90%, whenever MIG welding occurs in the primary MIG area. Capture efficiency at the point source of emissions shall be calculated at 85%, unless testing of the hood collection system demonstrates a different efficiency. Manual repair, mobile MIG welding, and the individual MIG robots on D Zone operations shall not require control.

(2) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification for each anti-spatter and cleaning solution employed; and

b. the organic compound content of each anti-spatter and cleaning solution, as applied.

(2) The permittee shall collect and record the following information each day for the welding operations:

a. the name and identification for each miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material employed to the auto body or metal part;

b. the volume, in gallons, of each miscellaneous sealer/sealant and quality marker coating employed; and

c. the total volume, in gallons, of all miscellaneous sealers/sealants and quality marker coatings employed.

If the total use of these materials, in any single day, is less than 1 gallon per day, the material used need only be recorded in the daily record as <1 gallon. Monthly emissions shall be calculated using actual monthly usage inventory records, if monthly records prove more accurate than the sum of daily usage.

(3) The permittee shall collect and record the following information each month for the welding operations to demonstrate compliance with the VOC, PM, PM10, and PM2.5 plantwide applicability limitations:

a. the number of gallons of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, miscellaneous organic material employed, and pounds (or tons) of MIG and brazing wire/rod consumed;

b. the volatile organic compound content of each cleaning solution, anti-spatter material, miscellaneous sealer/sealant, quality marker coating, and/or miscellaneous organic material, in pounds per gallon; and

c. the total volatile organic compound emissions from all cleaning solutions, anti-spatter materials, miscellaneous sealers/sealants, quality marker coatings, miscellaneous organic material usage, and the vaporization of rust preventive oils from spot welding, in pounds per month.

(4) The permittee shall maintain records that document any time periods when the hood collection or fabric filter systems were not in service when MIG welding occurs in the primary MIG welding area.

(5) The PTI application for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: dipropylene glycol monomethyl ether

TLV (mg/m^3): 606

Maximum Hourly Emission Rate (lb/hr): 6.43 from P004 & P330

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 1,401

MAGLC (ug/m^3): 14,430

The permittee, has demonstrated that emissions of dipropylene glycol monomethyl ether, from emissions units P004 and P330, are calculated to be less than eighty per cent of the maximum acceptable ground level concentrations (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing the use of noncomplying (>4.3 lb OC/gal) anti-spatter materials or cleaning solutions. 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 notify the Ohio EPA Central District Office in writing of any daily record showing that the welding line employed more than 10 gallons per day of miscellaneous sealers/sealant(s) and quality marker coating(s) (together). 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.

(3) The permittee shall notify the Ohio EPA Central District Office of any daily record showing that the hood collection system/fan and/or fabric filter were not in service when MIG welding occurs in the primary MIG welding area.

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

0.26 lb particulate emissions/hr from both Lines 1 and 2

<u>Applicable Compliance Method</u>:

Compliance with the hourly PE limitation shall be determined through calculation of worst case emissions. To document the worst case emission rate for particulate matter, the following equations shall be used:

Hourly Emissions = [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) x emission factor from Gradient Corporation and by the American Welding Company (0.01 lb particulate emissions/pound of MIG and brazing wire) x uncaptured fugitive emissions at the point of weld (100%-85%)] + [maximum MIG and brazing wire/rod usage (110.76 pounds per hour for Line 1 and Line 2) x emission factor from Gradient Corporation and by the American Welding Company (0.01 lb particulate emissions/pound of MIG and brazing wire) x fugitive emissions lost from the baghouse (85%) x (100%-90%)] = 0.26 lb particulate emissions/hour.

b. Emission Limitation:

Anti-spatter materials and cleaning solutions shall not exceed 4.3 lb OC/gal

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements specified in Section d)(3) above.

c. Emission Limitation:

Use of no more than 10 gallons per day of miscellaneous *sealers/sealants and quality marker coatings

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements specified in Section d)(2) above.

d. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

21. Emissions Unit Group -Weld Sealers: P005,P200

EU ID	Operations, Property and/or Equipment Description
P005	line 2 weld sealer
P200	line 1 weld sealer

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.5 lb/gallon of materials applied, excluding water. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	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.
c.	OAC rule 3745-21-09(U)(1)(i)	The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.0 pounds per gallon, as applied, excluding water and exempt solvents.
d.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091.

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

(2) Additional Terms and Conditions

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

i. Section b)(1)a.;

ii. Section d)(1);

iii. Section e)(1); and

iv. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the OC content of each coating applied, excluding water, as applied, in pounds OC pergallon.

If the permittee mixes complying materials at a line, it is not necessary to record the OC contentof the resulting mixture.

(2) The permittee shall collect and record the following information each month for the purpose ofdetermining 12-month rolling emissions from coatings in this emissions unit:

a. the name and identification of each VOC containing coating employed;

b. the VOC content of each coating , in pounds per gallon;

c. the number of gallons of each coating employed; and

d. the total VOC emissions from all coatings employed, in pounds or tons.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of noncomplying coatings, exceeding 0.5 pound per gallon of materials, excluding water. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.

(2) The permittee shall notify the director (Ohio EPA, Central District Office) in writing of each daily record showing the application of a coating with greater than 3.0 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of each such record and it shall be sent to the Central District Office within 30 days following the end of the calendar month during which the non-compliant coating was applied.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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>:

OC emissions shall not exceed 0.5 lb/gallon of materials applied, excluding water.

<u>Applicable Compliance Method</u>:

Compliance with the coating material OC limit shall be determined through monthlyrecordkeeping of the organic compound content of each coating material used, less water.Formulation data from the material's manufacturer or U.S. EPA Method 24 shall be used todetermine the organic compound content of the materials.

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

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.0 pounds per gallon, as applied, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the coating material VOC limit shall be determined through monthlyrecordkeeping of the organic compound content of each coating material used, less water.Formulation data from the material's manufacturer or U.S. EPA Method 24 shall be used todetermine the organic compound content of the materials.

c. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

22. P201, PA Line 1 E-coat Sanding

Operations, Property and/or Equipment Description:

Line 1 E-coat 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 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.34 lb/hr. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; 2.50 lb of VOC/hr; and See b)(2)b. and b)(2)c. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for PM, PM10, and PM2.5 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 PM, PM10, and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM2.5 emissions from this facility as specified in B.3
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is greater than the potential to emit for the emissions unit.

(2) Additional Terms and Conditions

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

b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emission limitation.

c. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1) 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.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b., b)(2)c.;

iii. Section c)(1);

iv. Section d)(2);

v. Section e)(1); and

vi. Section f)(1)a. and f)(1)c.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1- fabric filter control efficiency) where,

units = recorded for Line 1 per Section d)(3)

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

(3) The permittee shall maintain monthly records for emissions units P201, P205, and P346

a. the total Line 1 production rate, in units (cars/month), measured at the "PA Off" area.

(4) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

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

a. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

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

PE from the sanding operations shall not exceed 0.34 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office December 13, 2004):

(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)

where,
volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on 12/13/04
maximum quantity of units sanded = 73 per hour
control efficiency of fabric filter = 90% (assumes 100% capture).

b. 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).

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr;
2.50 lb of VOC/hr

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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.. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

g) Miscellaneous Requirements

(1) None.

23. P205, PA Line 1 primer/surfacer sanding

Operations, Property and/or Equipment Description:

Line 1 primer/surfacer 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 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.48 lb/hr. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO_2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; and 2.50 lb of VOC/hr. See b)(2)b. and b)(2)c. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		section d) contribute to the calculation of the total VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is greater than the potential to emit for the emissions unit.

(2) Additional Terms and Conditions

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

b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emission limitation.

c. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. 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.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b., b)(2)c.;

iii. Section c)(1);

iv. Section d)(2);

v. Section e)(1); and

vi. Section f)(1)a. and f)(1)c.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1- fabric filter control efficiency) where,

units = recorded for Line 1 per Section d)(3)

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

(3) The permittee shall maintain monthly records for emissions units P201, P205, and P346.

a. the total Line 1 production rate, in units (cars/month), measured at the "PA Off" area.

(4) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

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

a. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

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

PE from the sanding operations shall not exceed 0.48 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office December 13, 2004):

(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)

where,
volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on 12/13/04
maximum quantity of units sanded = 73 per hour
control efficiency of fabric filter = 90% (assumes 100% capture).

b. 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).

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

g) Miscellaneous Requirements

(1) None.

24. P223, AF Misc Solvents

Operations, Property and/or Equipment Description:

Solvent used for general cleanup and wiping

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 4.9 tons per rolling, 12-month period.
b.	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.

(2) Additional Terms and Conditions

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

i. Section b)(1)a.;

ii. Section e)(1); and

iii. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following informationon a monthly basis for this emissions unit:

a. theidentification for each solvent employed;

b. the total of miscellaneous solvents employed, in gallons;

c. the VOC emissions from solvents employed, in tons; and

d. the rolling, 12-month summation of VOC emissions, in tons.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing an OC/VOC emissions exceedance of 4.9 tons per rolling 12-month period.

These quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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>:

VOC emissions shall not exceed 4.9 tons per rolling, 12-month period.

<u>Applicable Compliance Method</u>:

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

g) Miscellaneous Requirements

(1) None.

25. P305, Line 1 Paint Effluent System

Operations, Property and/or Equipment Description:

paint effluent system, Line 1

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.07 tons per rolling, 12-month period.
b.	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.

(2) Additional Terms and Conditions

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

i. Section b)(1)a.;

ii. Section e)(1); and

iii. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following informationon a monthly basis for this emissions unit:

a. theidentification for each OC containing material added to the paint sludge wastewater for the purpose of paint overspray flocculation and removal and water treatment;

b. the number of gallons of OC containing materials added to these paint sludge wastewater systems;

c. the OC content of each OC containing material, in pounds per gallon; and

d. the total OC emissions from all OC containing materials added to each of these paint effluent systems, in tons per rolling 12-month period.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all monthly records showing an OC emissions exceedance of 3.07 tons per rolling 12-month period.

These quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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>:

Organic compound (OC) emissions shall not exceed 3.07 tons per rolling, 12-month period.

<u>Applicable Compliance Method</u>:

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

g) Miscellaneous Requirements

(1) None.

26. Emissions Unit Group -POPA Paint: P307,P340

EU ID	Operations, Property and/or Equipment Description
P307	POPA Paint Effluent System, existing system
P340	POPA Paint Effluent System, new system

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

(1) b)(1)c. and d)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The organic compound (OC) content of OC-containing water treatment materials, used in the POPA paint effluent systems, shall not exceed 2.64 lb/gal as a monthly volume-weighted average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	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.
c.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See the Facility-Wide Terms and Conditions and d)(2) below.

(2) Additional Terms and Conditions

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

i. Section b)(1)a.;

ii. Section d)(1)d.;

iii. Section e)(1); and

iv. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for P307 and P340:

a. the company identification for each material added to the paint effluent systems, for thepurpose of paint overspray flocculation and removal, algae/bacterial control, and watertreatment;

b. the number of gallons of each OC-containing material added to the paint effluent systems;

c. the OC content of each OC-containing material added to the paint effluent systems, inpounds per gallon;

d. the monthly volume-weighted average OC content of all OC-containing materials added tothe paint effluent systems, calculated as specified in Section f)(1)a.; and

e. the total OC emissions from all OC-containing materials added to the POPA paint effluent systems, in tons.

(2) The PTI application for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Stoddard solvent

TLV (mg/m^3): 573

Maximum Hourly Emission Rate (lb/hr): 2.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 86

MAGLC (ug/m^3): 13,630

The permittee, has demonstrated that emissions of Stoddard solvent, from this emissions unit, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing that the monthly volume-weighted average OC content of OC-containing materials, used in the POPA paint effluent systems, exceeded 2.64 pound of OC per gallon. These reports shall be submitted quarterly, as required in the Standard Terms and Conditions.

f) Testing Requirements

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

a. Emission Limitation

2.64 lb OC/gallon of material, added to the POPA paint effluent systems as a monthly volume-weighted average

Applicable Compliance Method

Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping, as specified in d)(1). Formulation data from each material's manufacturer or U.S. EPA Method 24 shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. The monthly volume-weighted average shall be calculated for each month's usage as follows:

mo. volume weighted average = the summation of all materials i through z, calculated as: [(lb OC/gal of material i) x (gal of material i/gal of all OC containing materials)] + ... + [(lb OC/gal of material z) x (gal of material z/gal of all OC containing materials)]

g) Miscellaneous Requirements

(1) None.

27. Emissions Unit Group -Injection Molding: P332,P333,P336,P345

EU ID	Operations, Property and/or Equipment Description
P332	Injection Molding, MHI 11
P333	Injection Molding, MHI8
P336	Injection Molding, MHI 7
P345	Plastic Injection Molding Machine (CM-5)

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

(1) b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound(OC) emissions shallnot exceed 56.0 pounds per hour from emissions units P336, P333, P332, and P345combined. The requirements ofthis rule also includecompliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	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.
c.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The hourly OC limit of 56.0 lb OC/hr for molding machines P336, P333, P332 and P345 is greater than the hourly potential to emit for each molding machine.

Therefore no additional monitoring, record keeping, or reporting is necessary to determine compliance with this limit.

b. The permittee shall maintain a label on this emissions unit which shall identify the machine. This identifying label shall be either the emission unit number assigned in this permit or the permittee's identification number, as described in the summary, found in the Authorization section of this permit.

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

i. Section b)(1)a.;

ii. Section b)(2)a.;and

iii. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for P336, P333, P332 and P345 combined:

a. the company identification for each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed;

b. the total number of gallons of each mold release, mold cleaner, mold protectant, and cleaning solvent employed, in gallons/month;

c. the OC content of each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets, in pounds/gallon or pounds/pound;

d. the calculated OC emissions from mold release, mold cleaner, mold protectant, and cleaning solvent;

e. the total amount of each polymer type of plastic pellets molded, in pounds or tons; and

f. the calculated OC emissions from plastic molding.

e) Reporting Requirements

(1) None.

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

Organic compound (OC) emissions shall not exceed 56.0 pounds/hour from emissions units P336, P333, P332 and P345 combined.

Applicable Compliance Method

56.0 pounds of OC/hour is more than the potential to emit for the operations P336, P333, P332, and P345. The following calculations shall be maintained on file and shall document the potential to emit for the emissions units contained in this permit:

Isopropanol (IPA):

1.6 grams/pump x 7 pumps*/bumper x 55 bumpers/hr x 0.002205 lb/gram x 50% IPA= 0.68 lb IPA/hr per machine

0.68 lb IPA/hr x 7 machines = 4.76 lb IPA/hr for all 7 machines

Mold Agents:

1.49 grams/sec x 60 sec/min x 10 min/use x 0.002205 lb/gram x 2 mold changes/hr = 3.94 lb petro/hr per machine

3.94 lb petro/hr per machine x (7 machines + 1 mold in maintenance) = 31.52 lb petro/hr for all 7 machines + 1 mold in maintenance.

Plastic Molding:

2160 lb pellets/hr x emission factor of 3% from AP-42, Fifth Edition, Table 4.4-2, 9/88* x 1% OC content= 0.648 lb OC/hr per machine

0.648 lb/hr OC x 7 machines= 4.54 lb OC/hr for all 7 machines

Total OC emission: 4.76 lb OC/hr from IPA + 31.52 lb OC/hr from cleaning mold + 4.54 lb OC from molding = 40.82 lb OC/hr from all 7 machines + 1 mold in maintenance.

* On March 18, 1998, this section of AP-42 was temporarily removed because of an inconsistency with the emission factors for open molding processes. U.S. EPA has stated that the emission factors for the closed molding operations listed in Table 4.4-2 are still valid. This emission factor reflects the total weight percentage of the inputted resin emitted during closed molding operations. The total OC emissions are dependent on the OC content of the plastic material.

g) Miscellaneous Requirements

(1) None.

28. P341, Line 2 Sludge Pit

Operations, Property and/or Equipment Description:

Line 2 sludge pit

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

(1) b)(1)c. and d)(2)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the water treatment materials added to the sludge pits shall not exceed 1.44 lb/gallon, including water and exempt solvents, as a monthly volume weighted average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-32(A)(6).
b.	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.
c.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See the Facility-Wide Terms and Conditions and d)(2) below.

(2) Additional Terms and Conditions

a. The Line 2 sludge pit operations consist of addition of water treatment materials that contain VOC to the sludge pits associated with coating activities in New Line 2. VOC emissions from the sludge pit operations are not controlled.

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

i. Section b)(1)a.;

ii. Section e)(1); and

iii. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for this emissions unit:

a. the name and identification of each water treatment material employed in the sludge pits;

b. the VOC content of each water treatment material employed in the sludge pits, in pounds per gallon;

c. the total number of gallons of each water treatment material employed; and

d. the calculated total VOC emissions from all water treatment material employed, in pounds per month.

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year.

e) Reporting Requirements

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

a. all records showing an exceedance of the VOC emission rate of 1.44 lb/gal, including water and exempt solvents, as a monthly volume weighted average.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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:

1.44 lb VOC/gal, including water and exempt solvents

Applicable Compliance Method:

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

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the VOC containing materials employed in this emissions unit.

g) Miscellaneous Requirements

(1) None.

29. P342, Line 2 E-coat Sanding

Operations, Property and/or Equipment Description:

Line 2 E-coat sanding operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.02 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6). See b)(2)b. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is greater than the potential to emit for the emissions unit.

(2) Additional Terms and Conditions

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

b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emission limitation.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b.;

iii. Section c)(1);

iv. Section d)(2);

v. Section e)(1); and

vi. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1-control efficiency of fabric filter control) where,

units = recorded per d)(3); and

average volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

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

(3) The permittee shall maintain the following records each calendar month, for Line 2, emissions units P342-P344:

a. the total combined production rate, in units (vehicles)/month, measured at "Paint Off".

e) Reporting Requirements

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

a. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Emission Limitation:

PE from the sanding operations shall not exceed 0.02 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(volume of sanding, cu. ft/unit) x (density of particulate, lb/cu. ft) x (maximum quantity of units sanded per hour) x (control efficiency of fabric filter control) where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.
maximum quantity of units sanded = 80 per hour
control efficiency of fabric filter = 98% (assumes 100% capture).

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-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.

30. P343, Line 2 Surfacer Sanding

Operations, Property and/or Equipment Description:

Line 2 surfacer sanding operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.05 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6). See b)(2)b. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is greater than the potential to emit for the emissions unit.

(2) Additional Terms and Conditions

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

b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emission limitation.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b.;

iii. Section c)(1);

iv. Section d)(2);

v. Section e)(1); and

vi. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units produced) x (average volume of sanding) x (density of particulate) x (1-control efficiency of fabric filter control) where,

units = recorded per d)(3); and
average volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

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

(3) The permittee shall maintain the following records each calendar month, for Line 2, emissions units P342-P344:

a. the total combined production rate, in units (vehicles)/month, measured at "Paint Off".

e) Reporting Requirements

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

a. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Emission Limitation:

PE from the sanding operations shall not exceed 0.05 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(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) where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003
maximum quantity of units sanded = 80 per hour
control efficiency of fabric filter = 98% (assumes 100% capture).

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-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.

31. P344, Line 2 Repair Sanding

Operations, Property and/or Equipment Description:

Line 2 repair sanding operations

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.12 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6). See b)(2)b. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is greater than the potential to emit for the emissions unit.

(2) Additional Terms and Conditions

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

b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emission limitation.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b.;

iii. Section c)(1);

iv. Section d)(2);

v. Section e)(1); and

vi. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units processed through the repair line) x (average volume of sanding) x (density of particulate) x (1-control efficiency of fabric filter control) where,

units = recorded for Line 2 on-line repair; and

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003.

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

(3) The permittee shall maintain the following records each calendar month, for Line 2, emissions units P342-P344:

a. the total combined production rate, in units (vehicles)/month, measured at "Paint Off".

e) Reporting Requirements

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

a. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Emission Limitation:

PE from the sanding operations shall not exceed 0.12 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the permit to install application received by the Ohio EPA, Central District Office August 20, 2003):

(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)

where,

volume of sanding and densities of particulate are based on the permit to install application submitted by Honda on August 20, 2003
maximum quantity of units sanded = 30 per hour
control efficiency of fabric filter = 98% (assumes 100% capture)

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-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.

32. P346, PA Line 1 Repair Sanding

Operations, Property and/or Equipment Description:

Line 1 on-line 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 3745-31-05(A)(3)	Particulate emissions (PE) from the sanding operations shall not exceed 0.54 lb/hr. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; and 2.50 lb of VOC/hr. See b)(2)b. and b)(2)c. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		section d) contribute to the calculation of the total VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is greater than the potential to emit for the emissions unit.

(2) Additional Terms and Conditions

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

b. The hourly PE emission limitation for this emissions unit was established to reflect the potential to emit and operation of the fabric filter control system. Therefore, it is not necessary to develop additional monitoring, recordkeeping and reporting requirements to ensure compliance with this emission limitation.

c. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1) 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.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b., b)(2)c.;

iii. Section c)(1);

iv. Section d)(2);

v. Section e)(1); and

vi. Section f)(1)a. and f)(1)c.

c) Operational Restrictions

(1) The permittee shall operate the fabric filter control system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of PE emissions for this emissions unit by using the following equation:

(# of units processed through the repair line) x (average volume of sanding) x (density of particulate) x (1- fabric filter control efficiency) where,

units = recorded for Line 1 on-line repair

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

(3) The permittee shall maintain monthly records for emissions units P201, P205, and P346:

a. the total Line 1 production rate, in units (cars/month), measured at the "PA Off" area.

(4) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

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

a. all records showing that the fabric filter control system was not in service when sanding operations occurred in this emissions unit.

These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

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

PE from the sanding operations shall not exceed 0.54 lb/hr

Applicable Compliance Method:

The hourly particulate emission limitation was based on the maximum hourly potential to emit for this emissions unit controlled by a fabric filter control system. The following calculation was used to establish the limitation (based on best engineering judgment and knowledge of the system, as submitted by the applicant in the emission activity category form received by the Ohio EPA, Central District Office December 13, 2004):

(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)

where,
volume of sanding and densities of particulate are based on the emission activity category form submitted by the permittee on 12/13/04
maximum quantity of units sanded = 29 per hour
control efficiency of fabric filter = 90% (assumes 100% capture).

b. 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).

c. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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.. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

g) Miscellaneous Requirements

(1) None.

33. P348, Injection Mold CM 1

Operations, Property and/or Equipment Description:

Plastic Injection Molding CM 1

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-32(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.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 8 pounds per hour. See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c. below.
d.	OAC rule 3745-31-05(F), as effective 12/01/06 (to avoid BAT requirements)	Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr. See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee shall maintain a label on this emissions unit which shall identify the machine. This identifying label shall be either the emission unit number assigned in this permit or the permittee's identification number, as described in the summary, found in the Authorization section of this permit.

b. The hourly VOC limit of 8 lb/hr was established to reflect the potential to emit for this emissions unit. Therefore,no additional monitoring, recordkeeping, or reporting is necessary to determine compliance with this limit.

c. 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 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).

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

i. Section b)(1)b., b)(1)c., b)(1)d.;

ii. Section b)(2)b., b)(2)c.;

iii. Section d)(1)g., d)(1)h., d)(1)i.; and

iv. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis:

a. the company identification for each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed;

b. the total number of gallons of each mold release, mold cleaner, mold protectant, and cleaning solvent employed, in gallons/month;

c. the VOC content of each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets, in pounds/gallon or pounds/pound;

d. the calculated VOC emissions from mold release, mold cleaner, mold protectant, and cleaning solvent;

e. the total amount of each polymer type of plastic pellets molded, in pounds or tons; and

f. the calculated VOC emissions from each polymer type of plastics molded;

g. the calculated annual summation of total VOC emissions from mold release, mold cleaner, mold protectant, and cleaning solvent employed, in tons;

h. the calculated annual summation of total VOC emissions from the molded plastic pellets, in tons; and

i. the total annual VOC emissions from this emissions unit.

e) Reporting Requirements

(1) None.

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 Limitations**:**

Volatile organic compound (VOC) emissions shall not exceed 8 pounds per hour (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method**:**

The hourly VOC limitation was established by summing the product of the maximum hourly usage and the VOC content for the molding plastics, mold release, mold protectant, mold cleaner and cleaning solvent used in this emissions unit.

Compliance with the annual VOC limitation may be determined through the recordkeeping specified in Section d)(1) above.

U.S. EPA Method 24 or formulation data for the mold release, mold cleaner, mold protectant, cleaning solvents, and molded plastic shall be used to determine the VOC content of the materials to be used in the calculation of emissions.

g) Miscellaneous Requirements

(1) None.

34. P349, Line 1 MVH Foam Application

Operations, Property and/or Equipment Description:

Application of polyurethane foam in vehicle cavities for sound deadening using robotic and/or manual applicators

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions from coatings shall not exceed 3.0 pounds per gallon (lb/gal), excluding water and exempt solvent materials, as applied. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC content from coatings shall not exceed 3.0 lb/gal, excluding water and exempt solvent materials, as applied. The requirements established pursuant to this rule also include compliance with OAC rules 3745-21-09(U)(1)(i) and 3745-31-32(A)(6). See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
d.	OAC rule 3745-31-05(F), as effective 12/01/06 (to avoid BAT requirements)	Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr. See b)(2)b. below.
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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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 Part 63, Subpart IIII	See b)(2)d. below.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)e. below.

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

i. Section b)(1)b., b)(1)c., b)(1)d.;

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

iii. Section f)(1)b.

d. The emissions limitation that applies to this emissions unit is identified in 40 CFR Part 63.3091 and is determined to be the following:

Average organic HAP emissions from all deadener materials used in the affected source 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 operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

(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 and cleaning material applied;

b. the VOC content of eachcoating and cleaning material applied;

c. the number of gallons of each coating and cleaning material employed;

d. the total VOC emissions from all coating and cleaning materials employed, in pounds or tons, 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); and

e. the total annual VOC emissions from this emissions unit.

(2) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

(3) 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 comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

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

(4) 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 shall not exceed 3.0 lb/gal, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the VOC content limit 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:

Volatile organic compound (VOC) emissions shall not exceed 10 ton/yr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined through the permit requirements and recordkeeping requirements in Section d)(1) above.

c. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

(2) 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.

35. R001, POPA Repair

Operations, Property and/or Equipment Description:

Plastic parts coating using hand held spray applicators

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compoundcontent of any coating applied in thisemissions unit shall not exceed 6.37 lb/gal of coating.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, PM, PM10, and PM2.5 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, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
c.	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.
d.	40 CFR Part 63, Subpart PPPP	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP , (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR 63.4491. Should Subpart PPPP be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. This rule shall not apply if the permittee

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

(2) Additional Terms and Conditions

a. Net gallons and VOC emissions may be calculated using the difference between materials used, minus materials collected for off-site recovery, recycle, and/or disposal. This may include any combination of waterborne and solvent borne coatings and cleanup materials. A composite sample of each shipment of recovered materials, including any combination of coating, cleanup, and purge, shall be collected and tested (on or off-site), using U.S. EPA Method 24, to determine the VOC content. The VOC emissions credit shall be calculated using the test result(s) of each shipment along with the amount of recovered materials each composite sample represents.

If coatings, purge, and/or cleanup materials from the POPA repair operations are added to the "plant's" solvent recovery, for off-site recycle and/or disposal, and if a credit for recovered material(s) is used to show compliance with the annual VOC limit, the credit for the recovered material shall be calculated proportionately, according to this emissions unit's VOC contribution to the shipment, and records of the recovered material shall be maintained as required in Section d)(2). No VOC credit, to the R001 emissions, shall be calculated using a volume or weight of recovered material greater than that which was added to the recovery container(s) from R001 operations during any month, nor an VOC concentration greater than the recovered material's VOC testing result(s) and MSDS/product information sheet(s) of the material(s) collected. Materials not included as "used" in the POPA repair operations (materials collected from other emission units) shall also not be included in the credit to these emissions and material use (gallons).

The credit to the facility emissions shall be calculated after Method 24 testing results have been received. The calculated credit to emissions may be applied to the 12-month rolling emissions in the month the material is shipped off-site, in the month the testing results are received, may be divided between the months in which the material was collected, or may be saved for credit to be applied in the following month or months, equal to the number of months the material was collected in the recovery tank(s).

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

i. Section b)(1)a.;

ii. Section d)(2)g.;

iii. Section e)(1); and

iv. Section f)(1)a.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation 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) The permittee shall comply with the applicable operating limits and work practice standards as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4480 through 63.4501. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.

(3) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR Part 63, Subpart IIII, the permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

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

(2) The permittee shall collect and record the following information for each month for the coating operations for the purpose of determining annual emissions and documentation of the VOC content of each coating and cleanup material applied:

a. the company identification for each coating and cleanup material employed in the repair booth;

b. the number of gallons of each coating and cleanup material employed in the repair booth;

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month, i.e., the summation of the products of the amounts (c) of all coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b);

e. if a credit for recovered materials is to be used, the total amount (in gallons) of purge, cleanup material, and coating collected and shipped for recycle/recovery and/or disposal at an outside facility, and the mass of VOC to be credited to the calculations of the coating operation's emissions;

f. if a credit for recovered materials is used, the net VOC emissions from all coatings and cleanup/purge materials employed, in pounds or tons per month; and

g. at the end of each year, annual emissions calculated from the monthly records.

(3) The permittee shall maintain records of the date the recovery tanks are emptied and recovered materials shipped off-site.

(4) The permittee shall comply with applicable notification(s), report(s), and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR Part 63, Subpart IIII for this emissions unit.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings, exceeding 6.37 lb VOC per gallon.

(2) The permittee shall shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service or not operated according to the manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit was conducting spray coating operations.

(3) 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.

(4) The permittee shall comply with applicable notification(s), report(s), and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR Part 63, Subpart IIII for this emissions unit.

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

f) Testing Requirements

(1) Compliance with the emission limitations contained in this permit shall be determined in accordance with:

a. Emissions Limitation:

The volatile organic compoundcontent of any coating applied in thisemissions unit shall not exceed 6.37 lb/gal of coating.

Applicable Compliance Method:

Compliance with this VOC limit shall be determined through monthly recordkeeping of the organic compound content of each coating and cleanup material used. Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the organic compound content of the coating and cleanup materials, to be used in the calculation of emissions.

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

36. R003, PA Line 2 Inner-Cavity Wax Application

Operations, Property and/or Equipment Description:

Line 2 inner cavity wax application with gas-fired makeup air

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 4.7 lb/gallon of coating applied, as daily volume-weighted average. Emissions from natural gas combustion in emission units, K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; 2.50 lb of VOC/hr; and PE from coating overspray shall not exceed 0.066 lb/hr See b)(2)a. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
c.	OAC rule 3745-21-09(U)(2)(f)	VOC emissions shall not exceed 4.7 lb/gallon of coating applied, as daily volume-weighted average. Exemption from OAC rule 3745-21-09(U)(1) for PTI that meets the provisions under this paragraph.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from a stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(C)	See b)(2)c. below.
g.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section

b)(1)a. 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.

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

i. Section b)(1)a;

ii. Section b)(2)a.; and

iii. Section f)(1)a., f)(1)b., f)(1)d.

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

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system whenever spray coating is applied in this emissions unit.

(2) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day (or month, per d)(1)d. below) for the inner-cavity wax operations:

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

b. the VOC content and the number of gallons 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 Cvoc,1; or

d. documentation showing daily volume-weighted average recordkeeping of the VOC per gallon is not required, if each and every coating applied in this emissions unit is at or below 4.7 pounds of VOC per gallon; this documentation for each material applied in R003 must be maintained on file and provided upon request, and recordkeeping may then be maintained monthly.

(2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3):

a. the name and identification of each coating, reducing solvent, and other material employed;

b. the VOC content of each coating, reducing solvent, and other material employed;

c. the number of gallons of each coating, reducing solvent, and other material employed; and

d. the total VOC emissions from all coatings, reducing solvents, and/or other materials 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 coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b).

(3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the VOC plantwide applicability limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating

Any new emission or modified unit associated with the permittee's body painting operations

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

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emission units listed in Section d)(3) above:

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 applied (a) in the emission units listed in Section d)(3) above, times each material's VOC content (b).

(5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the VOC plantwide applicability 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 coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, and R003 and from the cleanup and purge materials applied in the emissions units listed in Section d)(3).

(6) The permittee shall maintain monthly records in order to document the rolling 12-month emissions from the Line 1 and Line 2 emission units, which contain the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in the emission units K201, K206, K208, R102, R103, and R003,

b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3);

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, recorded and calculated as per Section d)(5); and

d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emission units, in pounds or tons per month, i.e., (a) + (b) - (c).

(7) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when spray coating was applied in this emissions unit.

(8) In order to determine the particulate emissions from overspray, the permittee shall maintain monthly records for inner-cavity wax application of the following information:

a. the usage of each coating, in gallons;

b. the coating density of each coating, in pounds per gallon;

c. the solids content of each coating (weight percent);

d. the transfer efficiency of each coating applied;

e. the dry filtration system control efficiency; and

f. the calculated particulate emissions from overspray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).

(9) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

(10) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Central District Office, in writing, of any daily or monthly record showing that the daily volume-weighted average VOC content exceeds 4.7 pounds per gallon. 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.

(2) The permittee shall submit quarterly deviation (excursion) reports of any record showing that the dry filtration system was not in service when spray coating was applied in this emissions unit. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

(3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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:

4.7 lb VOC/gallon of coating as a daily volume weighted average

Applicable Compliance Method:

Compliance with the daily volume-weighted average VOC limit for the cavity wax application shall be determined through recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions.

Calculations of the daily volume-weighted average shall follow those as specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc1. If complying coatings are used to meet the emission limitation, it is not necessary to calculate the daily volume-weighted average.

b. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

c. Emission Limitation:

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

Applicable Compliance Method:

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).

d. Emission Limitation:

0.066 pound particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration system found in Sections c)(1), d)(7), and e)(2). 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 3745-17-3(B)(10).

e. 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 1,020 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).

f. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

37. R016, PA Material Test Lab (MTL)

Operations, Property and/or Equipment Description:

PA Material Test Lab (MTL)

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

(1) b)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The total coating usage shall not exceed 10 gallons per day when coating metal parts. PE from coating overspray shall not exceed 0.551 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U) and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, PM, PM10, and PM2.5 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, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.
d.	OAC rule 3745-17-11(C)	See b)(2)c. below.
e.	ORC 3704.03(F)(3)(c) and F(4) (Toxic air contaminant statute)	See the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. In order to test the spray applicator's effect, coatings being tested in MTL can be applied in the Final Repair Booth (K007). Honda shall include the emissions from this application of MTL test coatings in the Final Repair paint booth as part of the emissions calculated forthis emissions unit (MTL).

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

i. Section b)(1)a.; and

ii. Section f)(1)b.

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

c) Operational Restrictions

(1) The permittee shall operate the water curtain whenever spray coating is applied in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day when coating metal parts:

a. the company identification 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.

(2) The permittee shall collect and record the following information each month for this emissions unit:

a. the company identification of each coating employed;

b. the VOC content and the number of gallons of each coating, thinning solvent applied;

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

d. the calculated total VOC emission rate for all coating and thinning solvent, in pound per month.

(3) The permittee shall maintain records that document any time periods when the water curtain was not in service when spray coating was applied in this emissions unit.

(4) Monthly usage of clean-up and purge materials shall be collected and recorded.

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the director (the Ohio EPA, Central District Office) within 45 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the followingany record showing that the water curtain was not in service when the emissions unit was in operation while applying a spray coating and shall include any corrective actions taken.

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

(3) 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 limitations contained in this permit shall be determined in accordance with the following methods:

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

The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

<u>Applicable Compliance Method</u>:

Compliance with the daily coating usage limitation shall be determined through daily record keeping specified in Section d)(1) above.

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

0.551 lb PE/hr from coating overspray

<u>Applicable Compliance Method</u>:

Daily compliance with this limit shall be based on maintaining the requirements for the water curtain control equipment found in Sections c)(1), d)(2), and e)(2). If

required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

g) Miscellaneous Requirements

(1) None.

38. Emissions Unit Group -Instrument Panel Pad Process: R021,R022

EU ID	Operations, Property and/or Equipment Description
R021	Accord pad #3 instrument panel pad sheet application, with flash/foundation and cure ovens
R022	Accord pad #4 instrument panel pad sheet application, with flash/foundation and cure ovens

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound and volatile organic compound (OC/VOC) emissions shall not exceed 3.10 pounds per hour from each emissions unit. The requirements of this rulealso include compliance withthe requirements of OAC rule 3745-31-32(A)(6). See b)(2)a. below.
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC emissions apply to this emissions unit. The PALs for VOC 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 emissions from this facility as specified in B.3.

(2) Additional Terms and Conditions

a. The hourly OC/VOC emission limitation is based on potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are needed to demonstrate compliance with this limitation.

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

i. Section b)(1)a.;

ii. Section d)(1); and

iii. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the Pad lines # 3 and #4 instrument panel pad sheet application operations, for the purpose of determining the rolling 12-month material usage and emissions:

a. the number of instrument panel parts produced on the Pad lines #3 and #4 (number/month), and the calculated emissions using the following equation:

VOC emissions = # instrument panel parts/month x emissions factor in lb VOC per panel part*; and

b. the total VOC emissions from all instrument panel parts produced in R021 and R022 together, in pounds or tons per month.

*The emissions factor shall be based on the most recent testing of the facility's worst-case pad material.

e) Reporting Requirements

(1) None.

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>

Organic compound and volatile organic compound (OC/VOC) emissions shall not exceed 3.10 pounds per hour.

Applicable Compliance Method

The hourly OC/VOC emission limitation was based on the maximum hourly potential to emit for this emissions unit. The following calculation was used to establish the limitation.

OC/VOC = (Instrument Panel Parts) x (EF), where:

Instrument Panel Parts = 62 parts per hour (maximum number of instrument panel parts produced in an hour based on current cycle time plus a 15% safety factor)
EF= 0.05 lb OC/VOC per instrument panel part (emission factor based on facility's worst-case pad material test result (0.037 lb OC/VOC/part) plus a 35% safety factor)

g) Miscellaneous Requirements

(1) None.

39. Emissions Unit Group -Weld Wipe: R023,R024

EU ID	Operations, Property and/or Equipment Description
R023	Line 1 Weld Wipe
R024	Line 2 Weld Wipe

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The organic compound content ofmaterials used in this emissions unitshall not exceed 4.3 pounds pergallon of material. The requirements of this rule alsoinclude compliance with therequirements of OAC rule 3745-31-32(A)(6).
b.	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.

(2) Additional Terms and Conditions

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

i. Section b)(1)a.;

ii. Section e)(1); and

iii. Section f)(1)a.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the weld wipe operations:

a. the name and identification of each OC/VOC containing material employed;

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

c. the total number of gallons of OC/VOC containing materials employed in emissions units R023 and R024, combined; and

d. the total OC/VOC emissions from emissions units R023 and R024, combined (lb or ton).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the 4.3 pounds of OC per gallon limitation.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Term and Conditions

f) Testing Requirements

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

a. <u>Emission Limitation</u>

The organic compound content of materials used in this emissions unit shall not exceed 4.3 pounds per gallon of material.

<u>Applicable Compliance Method</u>

Compliance with the OC content of materials applied shall be determined through monthly recordkeeping, as specified in d)(1). Formulation data from the manufacturer of the material or U.S. EPA Method 24 shall be used to determine the organic compound content of the weld sealer body wipe solvent blend, to be used to demonstrate compliance.

g) Miscellaneous Requirements

(1) None.

40. R102, PA Line 1 Sealer/Deadener Application

Operations, Property and/or Equipment Description:

Line 1 sealer/deadener application with gas-fired makeup air and heated flush zone

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 0.3 lb/gallon of coating applied, excluding water and exempt solvents. Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; and 2.50 lb of VOC/hr. See b)(2)a. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(i), and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 are listed in the facility-wide terms and conditions in B.2. The recordkeeping requirements in

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		section d) contribute to the calculation of the total VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
c.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 3.0 lb/gallon, excluding water and exempt solvent materials. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1) 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.

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

i. Section b)(1)a;

ii. Section b)(2)a.; and

iii. Section f)(1)b.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the sealer/deadener application:

a. the name and identification of each coating applied; and

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

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3):

a. the name and identification of each coating, reducing solvent, and other material employed;

b. the VOC content of each coating, reducing solvent, and other material employed;

c. the number of gallons of each coating, reducing solvent, and other material employed; and

d. the total VOC emissions from all coatings, reducing solvents, and/or other materials 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 coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b).

(3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC plant wide applicability limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1

P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating
Any new emission or modified unit associated with the permittee's body painting operations

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

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units listed in Section d)(3), above:

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 applied (a) in the emissions units listed in Section d)(3) above, times each material's VOC content (b).

(5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the VOC plant wide applicability 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 OC/VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R003, R102, and R103 and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), i.e., (c) x (d).

(6) The permittee shall maintain monthly records in order to document the rolling, 12-month emissions from the Line 1 and Line 2 emissions units, which contain the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in emissions units K201, K206, K208, R102, R103, K002, K003, K004, R002, and R003;

b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3);

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, recorded and calculated as per Section d)(5); and

d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emissions units, in pounds or tons per month, i.e., (a) + (b) - (c).

(7) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

(8) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing the use of non-complying coatings, in exceedance of the applicable limit of 0.3 lb VOC/gal or 3.0 lb VOC/gal, minus 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 comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3110 through 63.3131.

f) Testing Requirements

(1) Compliance with the 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:

0.3 lb VOC/gallon of coating excluding water and exempt solvents

VOC emissions shall not exceed 3.0 lb/gallon, excluding water and exempt solvent materials.

Applicable Compliance Method:

Compliance with this emission limitation for the sealer/deadener application shall be determined through monthly recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound and water contents of the coatings and materials. Calculations of VOC content and compliance procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

b. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

c. Emission Limitation:

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

Applicable Compliance Method:

See 40 CFR Part 63, Subpart IIII (40 CFR 63.3080 through 63.3176).

g) Miscellaneous Requirements

(1) None.

41. R103, PA Line 1 Inner-Cavity Wax Application

Operations, Property and/or Equipment Description:

Line 1 inner cavity wax application with gas-fired makeup air

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 4.7 lb/gallon of coating applied, as daily volume-weighted average. Emissions from natural gas combustion in emission units, K201, K206, K208, R003, R102, R103, P201, P205, and P346, combined shall not exceed: 8.14 lb of PE/hr; 0.26 lb of SO_2/hr; 46.93 lb of NOx/hr; 36.69 lb of CO/hr; and 2.50 lb of VOC/hr. PE from coating overspray shall not exceed 0.071 lb/hr. See Section b)(2)a. below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-32(A)(6).
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3
c.	OAC rule 3745-21-09(U)(2)(f)	VOC emissions shall not exceed 4.7 lb/gallon of coating applied, as daily volume-weighted average. Exemption from OAC rule 3745-21-09(U)(1) for PTI that meets the provisions under this paragraph.
d.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from a stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(C)	See Section b)(2)c. below.

(2) Additional Terms and Conditions

a. Additional natural gas combustion sources (no individual burner greater than 10MMBtu/hr) may be installed in K201, K206, K208, R003, R102, R103, P201, P205, and P346 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 436.8 MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1) 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.

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

i. Section b)(1)a;

ii. Section b)(2)b.; and

iii. Section f)(1)b., f)(1)d., f)(1)e.

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

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system whenever spray coating is applied in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day (or month, per d)(1)d. below) for the inner-cavity wax operations:

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

b. the VOC content and the number of gallons 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 Cvoc,1; or

d. documentation showing daily volume-weighted average recordkeeping of the VOC per gallon is not required, if each and every coating applied in this emissions unit is at or below 4.7 pounds of VOC per gallon; this documentation for each material applied in R103 must be maintained on file and provided upon request, and recordkeeping may then be maintained monthly.

(2) The permittee shall collect and record the following information each month for the purpose of determining the contribution of coatings, reducing solvents, and/or other materials applied in this emissions unit, excluding cleanup and purge materials, maintained in Section d)(3):

a. the name and identification of each coating, reducing solvent, and other material employed;

b. the VOC content of each coating, reducing solvent, and other material employed;

c. the number of gallons of each coating, reducing solvent, and other material employed; and

d. the total VOC emissions from all coatings, reducing solvents, and/or other materials 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 coatings, reducing solvents, and other materials applied in this emissions unit (a) times each material's VOC content (b).

(3) Air emissions from cleanup/purge material usage, associated with the operations of the following emissions units in the Marysville Auto Plant, including any recovered material to be credited to these emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the VOC plant wide applicability limitation:

K007-PA Final Repair
K011-PA ATF
K201-PA E-coat Line 1
K206-PA Primer/Surfacer Line 1
K208-PA Topcoat Line 1
P201-PA Line 1 E-Coat Sanding
P205-PA Line 1 Guide Coat Sanding
R003-PA Line 2 Inner-Cavity Wax
R016-PA MTL
R102-PA Line 1 Sealer/Deadener
R103-PA Line 1 Inner-Cavity Wax
K227-Line 1 Wheel Well Blackout
K228-Line 2 Wheel Well Blackout
K235-Line 2 E-Coat
K236-Line 2 Primer/Surfacer
K237-Line 2 Topcoat
K238-Line 2 Sealer/Deadener/LASD
K239-Line 1 and Line 2 Polish
K240-Line 1 LASD
P346-PA Line 1 On-Line Repair Sanding
P342-Line 2 E-Coating Sanding
P343-Line 2 Surfacer Sanding
P344-Line 2 Repair Sanding
Z147-PA Line 1 Phosphate Coating
Z355-PA Line 2 Phosphate Coating
Any new emission or modified unit associated with the permittee's body painting operations.

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

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emission units listed in Section d)(3) above:

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 applied (a) in the emission units listed in Section d)(3), above, times each material's VOC content (b).

(5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units:

a. the date the recovery tank was emptied;

b. the date the materials from the recovery tank were shipped off site;

c. the number of gallons of materials from the recovery tank shipped off site;

d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units K201, K206, K208, R102, R103, and R003 and from the cleanup and purge materials applied in the emissions units listed in Section d)(3), i.e., (c) x (d).

(6) The permittee shall maintain monthly records in order to document the rolling 12-month emissions from the Line 1 and Line 2 emission units, which contain the following information:

a. the total VOC emissions from all coatings, reducing solvents, and/or other materials (excluding cleanup/purge) employed in the emission units K201, K206, K208, R102, R103, and R003,

b. the total VOC emissions from all cleanup and purge materials employed in the emissions units listed in Section d)(3);

c. if a credit for recovered cleanup and purge materials is used, the total VOC emissions from recovered materials (Section d)(5)e.), to be credited to the calculations of the Line 1/Line 2 VOC emissions, recorded and calculated as per Section d)(5); and

d. the total net VOC emissions from all coatings, reducing solvents, cleanup/purge, and other materials employed in the emission units, in pounds or tons per month, i.e., (a) + (b) - (c).

(7) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when spray coating was applied in this emissions unit.

(8) In order to determine particulate emissions from overspray, the permittee shall maintain monthly records for inner-cavity wax application of the following information:

a. the usage of each coating, in gallons;

b. the coating density of each coating, in pounds per gallon;

c. the solids content of each coating (weight percent);

d. the transfer efficiency of each coating applied;

e. the dry filtration system control efficiency; and

f. the calculated particulate emissions from overspray (i.e., (a) x (b) x (c) x (1-d) x (1-e)).

(9) The permittee shall track monthly natural gas usage for this emissions unit as part of the facility wide natural gas tracking described in section B.4.d) of this permit.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Central District Office, in writing, of any daily or monthly record showing that the daily volume-weighted average VOC content exceeds 4.7 pounds per gallon. 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.

(2) The permittee shall submit quarterly deviation (excursion) reports of any record showing that the dry filtration system was not in service when spray coating was applied in this emissions unit. These reports shall be submitted to the Ohio EPA, Central District Office in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.

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>:

4.7 lb VOC/gallon of coating as a daily volume weighted average

<u>Applicable Compliance Method:</u>

Compliance with the daily volume-weighted average VOC limit for the cavity wax application shall be determined through recordkeeping requirements, as specified in Section d)(1). Formulation data from the manufacturers or U.S. EPA

Method 24 shall be used to determine the volatile organic compound contents of the coatings and materials, to be used in calculations of emissions.

Calculations of the daily volume-weighted average shall follow those as specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc1. If complying coatings are used to meet the emission limitation, it is not necessary to calculate the daily volume-weighted average.

b. Emission Limitations:

Emissions from natural gas combustion in emission units K201, K206, K208, R003, R102, R103, P201, P205, and P346 combined shall not exceed:

8.14 lb of PE/hr;
0.26 lb of SO2/hr;
46.93 lb of NOx/hr;
36.69 lb of CO/hr; and
2.50 lb of VOC/hr.

Applicable Compliance Method:

These emission limitations represent the maximum capacity of the burners. These emission limitations were determined by multiplying the maximum natural gas usage from the burners (436,800 ft^3/hr) 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. These amounts were multiplied by 8,760 hours per year and divided by 2,000 pounds per ton, to obtain the potential emissions of the burners. Since these emission limitations reflect the potential emissions of the burners, no additional compliance determination is required.

c. Emission Limitation:

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

Applicable Compliance Method:

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).

d. Emission Limitation:

0.071 pound particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this limit shall be based on meeting the requirements for the dry filtration system found in Sections c)(1), d)(7), and e)(2). 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 3745-17-3(B)(10).

e. 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 1,020 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).

g) Miscellaneous Requirements

(1) None.

42. R200, POPA Primer Booth & Oven

Operations, Property and/or Equipment Description:

Primer Booth for POPA plastic parts coating lines, with infrared oven, natural gas oven, and/or dehumidification system

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from the application and drying of waterborne primer coatings in the primer booth shall not exceed 17.44 pounds per hour (lb/hr). VOC emissions from the application and drying of solvent-based repaint primer shall not exceed 183.46 lb/hr. See b)(2)a. below. PE from overspray in R200 shall not exceed 0.98 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-32(A)(6). Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed: 5.04 lb nitrogen oxide (NOx) per hr

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		4.24 lb carbon monoxide (CO)/hr 0.10 lb filterable PE/hr 0.28 lb VOC/hr 0.03 lb sulfur dioxide (SO_2)/hr
b.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(C)	See b)(2)e. below.
e.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
f.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR 63.4491. Should Subpart PPPP be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. This rule shall not apply if the permittee elects to include this emissions unit in the affected source subject to 40 CFR Part 63 Subpart IIII.
g.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	If the permittee elects to include this emission unit in the affected source subject to 40 CFR Part 63 Subpart IIII, the permittee shall comply with the applicable emission limitation(s) as

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitations were established to reflect the potential to emit for each type of coating employed in this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping, and reporting requirements to ensurecompliance with these emission limitations.

b. The use of solvent-based repaint primer on all coated parts is not a typical operation for this emissions unit. However, in some cases it may be necessary to temporarily coat allparts with solvent-based repaint primer in order to maintain production.

c. Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 50.44MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit An accurate list of the natural gas combustion sources in operation shall be maintained by thefacility and made available to Ohio EPA staff upon request.

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

i. Section b)(1)a.;

ii. Section b)(2)a., b)(2)b., b)(2)c.; and

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

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

Should OAC rule 3745-31-05 (or other applicable Ohio regulations) be amended to exclude sources subject to a plant-wide applicability limit from the requirement to be subject to BAT requirements, the requirements of OAC rules 3745-17-11(C)(1) & (2) shall become effective.

c) Operational Restrictions

(1) The permittee shall operate the downdraft air system whenever a spray coating is applied in this emissions unit.

(2) The permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4480 through 63.4501. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.

(3) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63 Subpart IIII, the permittee shall operate this emissions unit in accordance with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for the POPA coating operations (R200 and R201):

a. the company identification for each coating, solvent, and cleanup/purge material employed;

b. the number of gallons of each coating, solvent, and cleanup/purge material employed;

c. the VOC content of each coating, solvent, and cleanup/purge material, in pounds per gallon;

d. the total VOC emissions for all coatings, solvent, and cleanup/purge materials, prior to any credit for recovered materials, in pounds or tons per month;

e. if a credit for recovered materials is used, the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (from Section d)(2)e. below); and

f. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (i.e., (d) - (e)).

(2) If a credit for recovered materials is used in Section d)(1) above, the permittee shall maintain the following records for the recovered materials and the recovery tank(s) serving emissions units R200 and R201:

a. the date the material is removed from the POPA recovery tank(s);

b. the date the materials from the POPA recovery tank(s) were shipped off site;

c. the number of gallons of materials from the POPA recovery tank(s) shipped off site;

d. the VOC content of the materials from the POPA recovery tank(s), in pounds per gallon; and

e. the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge and cleanup materials employed, in pounds or tons.

(3) The permittee shall maintain records that document any time periods when the downdraft air system was not in service when a spray coating was applied in this emissions unit.

(4) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531.This requirement shall not apply if the permittee elects to comply with 40 CFR Part 63, Subpart IIII for this emissions unit.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the downdraft air system was not in service when spray coating was applied in this emissions unit.

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

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

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

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

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).

b. Emission Limitation

17.44 lb VOC /hr from waterborne primer coatings
183.46 lbVOC /hr from solvent-based repaint primer coatings

Applicable Compliance Method

The hourly VOC limitations were established by multiplying the maximum hourly coating usage for each material (14.53 gallons of waterborne primer and 30.164 gallons of solvent-based repaint primer) by the maximum VOC content for each material (1.2 lbVOC/gal for waterborne primer and 6.082 lbVOC/gal for solvent-based repaint primer).

c. Emission Limitations

Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:

5.04 lb NOx/hr
4.24 lb CO/hr
0.10 lb filterable PE/hr

0.28 lb VOC/hr
0.03 lb SO_2/hr

Applicable Compliance Method

These limits represent the maximum capacity of the burners of all the drying ovens, the air supply units, the concentrator(s), and the RTO for the POPA operations. These emission limitations were determined by multiplying the maximum natural gas usage from all these burners (50,435 ft^3/hr) 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. The RTO burners shall be fueled by the volatile organic compounds, for which they were installed to controland supplemental natural gas from the fuel injector.It is estimated that the RTO burner shall require no more than 50 hours of natural gas fuel to begin combustion. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

d. Emissions Limit

0.98 lb PE/hr from overspray in the primer booth

Compliance Method

Compliance with the hourly limit shall be based on meeting the requirements for the downdraft air system found in Sections c)(1), d)(3), and e)(1)above. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

e. 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 1,020MMBtu /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).

f. Emission Limitation:

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

Applicable Compliance Method:

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

g. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

43. R201, POPA Topcoat Process

Operations, Property and/or Equipment Description:

POPA topcoat process with coating booths, natural gas-fired air supply, oven, concentrator and RTO control

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions from the application and drying of coatings in shall not exceed 33.76 lb/hr. PE from overspray in R201 shall not exceed 1.49 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-32(A)(6). Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed: 5.04 lb NOx/hr; 4.24 lb CO/hr; 0.10 lb filterable PE/hr; 0.28 lb VOC/hr; and 0.03 lb SO_2/hr.
b.	OAC rule 3745-21-07(M)(3)(d)(vi)	See b)(2)a. below
c.	OAC rule 3745-31-32(A)(6)	The Plantwide Applicability Limitations (PALs) for facility-wide VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions apply to this emissions unit. The PALs for VOC, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 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, NOx, CO, SO2, GHG, PM, PM10, and PM2.5 emissions from this facility as specified in B.3.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving any indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity as a6-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(C)	See b)(2)d. below.
f.	OAC rule 3745-17-10(B)	PE shall not exceed 0.020 lb/MMBtu of actual heat input from any indirect-fired oven zone associated with this emissions unit
g.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products), in accordance with 40 CFR Part 63.4491. Should Subpart PPPP be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. This rule shall not apply if the permittee elects to include this emissions unit in the affected source subject to 40 CFR Part 63 Subpart IIII.
h.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	If the permittee elects to include this emission unit in the affected source subject to 40 CFR Part 63 Subpart IIII, the permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

a. This emissions unit shall not be subject to the requirements of paragraphs (M)(3)(a) and (M)(3)(b) of OAC rule 3745-21-07 provided that the emissions unit is equipped with capture and control equipment that provide not less than an eighty-one percent reduction, by weight, in the overall volatile organic compound emissions from the application and drying of plastic part coatings within this emissions unit. For any reductions that are achieved by incineration, the incineration equipment shall provide not less than ninety percent, by weight, destruction (control) efficiency.

b. Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below 50.44MMBtu/hr. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section b)(1)a. of this permit An accurate list of the natural gas combustion sources in operation shall be maintained by thefacility and made available to Ohio EPA staff upon request.

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

i. Section b)(1)a.;

ii. Section b)(2)b.;

iii. Section c)(1); and

iv. Section f)(1)b. through f)(1)d.

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

c) Operational Restrictions

(1) The permittee shall operate the concentrator and regenerative thermaloxidizer (RTO) whenever this emissions unit is in operation.

(2) The permittee shall operate the downdraft air system whenever a spray coating is applied in this emissions unit.

(3) The permittee shall comply withthe applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4480 through 63.4501. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.

(4) If the permittee elects to include this emissions unit in the affected source subject to 40 CFR 63 Subpart IIII, the permittee shall comply with the applicable operating limits and work practices standards as specified in 40 CFR Part 63, Subpart IIII, in accordance with 40 CFR 63.3093 through 63.3101.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for emissions units R200 and R201:

a. the company identification for each coating, solvent, and cleanup/purge material employed;

b. the number of gallons of each coating, solvent, and cleanup/purge material employed;

c. the VOC content of each coating, solvent, and cleanup/purge material, in pounds per gallon;

d. the total VOC emissions for all coatings, solvent, and cleanup/purge materials, prior to any credit for recovered materials, in pounds or tons per month;

e. if a credit for recovered materials is used, the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent,and purge/cleanup materials employed, in pounds or tons (from Section d)(2)e. below);

f. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (i.e., (d) -(e)); and

g. the controlled net VOC emissions from all coatings, coating components, and cleanup/purge materials employed, in pounds or tons per month (based on the most recent emissions testing).

(2) If a credit for recovered materials is used in Section d)(1) above, the permittee shall maintain the following records for the recovered materials and the recovery tank(s) serving emissions units R200 and R201:

a. the date the material is removed from the POPA recovery tank(s);

b. the date the materials from the POPA recovery tank(s) were shipped off site;

c. the number of gallons of materials from the POPA recovery tank(s) shipped off site;

d. the VOC content of the materials from the POPA recovery tank(s), in pounds per gallon; and

e. the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings, solvent, and purge and cleanup materialsemployed, in pounds or tons.

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

(4) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was incompliance, or below 1,200 degrees Fahrenheit until such time of testing.

(5) The permittee shall collect and record the following information each day for the control equipment:

a. for the RTO and concentrator, a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was inoperation; and

b. all 3-hour blocks of time during which the average combustion temperatures within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance, or below 1200 degrees Fahrenheit until suchtime of testing.

(6) The permittee shall maintain records that document any time periods when the downdraft air system was not in service when a spray coating was applied in this emissions unit.

(7) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart PPPP, in accordance with 40 CFR 63.4510 through 63.4531. This requirement shall not apply if the permittee elects to comply with 40 CFR 63 Subpart IIII for this emissions unit.

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

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified above; and

b. any record showing that the downdraft air system was not in service when spray coating was applied in this emissions unit.

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

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

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

f) Testing Requirements

(1) Compliance with the 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 particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

<u>Applicable Compliance Method</u>:

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).

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

Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:

5.04 lb NOx/hr
4.24 lb CO/hr
0.10 lb filterable PE/hr
0.28 lb VOC/hr
0.03 lb SO_2/hr

Applicable Compliance Method:

These limits represent the maximum capacity of the burners of all the drying ovens, the airsupply units, the concentrator(s), and the RTO for the POPA operations. These emissionlimitations were determined by multiplying the maximum natural gas usage from all theseburners (50,435 ft^3/hr) by the emission factors for each pollutant (lb of pollutant/MM ft^3) foundin "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and1.4-2. The RTO burners shall be fueled by the volatile organic compounds, for which they were installedto control, and supplemental natural gas from the fuel injector.It is estimated that the RTO burner shall require no more than 50 hours of natural gas fuel tobegin combustion. Since these limits reflect the potential emissions of the burners, noadditional compliance determination is required.

c. Emissions Limit:

1.49 lb PE/hr from overspray in R201

Compliance Method:

Compliance with the hourly limit shall be based on meeting the requirements for the downdraft air system found in Sections c)(2), d)(6), and e)(1). If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

d. Emission Limitation:

33.76 lb VOC/hr

Compliance Method:

i. The permittee shall conduct emission testing to demonstrate compliance with the hourly emission limit, through a mass balance demonstration, and to document the overall reduction of VOC emissions from the coating operations, after actual control and capture efficiencies are measured.

ii. Emission testing shall be conducted at least once every five years after permit issuance.

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1 for sample and velocity traverses; Method 2 for velocity and volumetric flow rates; Method 24 for the VOC content of the coating; Methods 25 or 25A for destruction efficiency after the RTO; Methods 18, 25 or 25A for the VOC

concentration in the effluent gas leaving the concentrator; and Methods 204A through F for the capture efficiency of the concentrator. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; or, any Method of testing may be required/requested by the Administrator.

iv. 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.

v. 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).

vi. 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.

vii. 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.

e. 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 1,020MMBtu /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).

f. Emission Limitation:

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

Applicable Compliance Method:

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

g. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.