



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

2/12/2009

Certified Mail

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

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: 01-07448
Permit Type: Administrative Modification
County: Union

Dear Permit Holder:

Enclosed please find a final 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.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA DAPC, Central District Office

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install
for**

Honda of America Mfg., Inc., Marysville Auto Plant

Facility ID: 0180010193
Permit Number: 01-07448
Permit Type: Administrative Modification
Issued: 2/12/2009
Effective: 2/12/2009



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

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

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 01-07448
Facility ID: 0180010193
Effective Date: 2/12/2009

Authorization

Facility ID: 0180010193
Facility Description: Motor Vehicles and Car Bodies
Application Number(s): A0001779
Permit Number: 01-07448
Permit Description: Modification as result of an appeal - Miscellaneous application of sealers and adhesives, corrosion protectants and lubricants, paints and primers on Lines 1 and 2.
Permit Type: Administrative Modification
Permit Fee: \$600.00
Issue Date: 2/12/2009
Effective Date: 2/12/2009

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 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

Chris Korleski
Director



Authorization (continued)

Permit Number: 01-07448
 Permit Description: Modification as result of an appeal - Miscellaneous application of sealers and adhesives, corrosion protectants and lubricants, paints and primers on Lines 1 and 2.

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

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
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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 01-07448
Facility ID: 0180010193
Effective Date: 2/12/2009

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 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) The permittee must comply with all terms and conditions of this permit. 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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, 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, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) 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 the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) 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.

c) 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.
- d) 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 (i.e.,



postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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).

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 party 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 through completion of the annual PER covering the last period of operation 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 PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 01-07448
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17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 01-07448
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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 01-07448
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C. Emissions Unit Terms and Conditions



1. K224, Miscellaneous Sealers and Adhesive Application

Operations, Property and/or Equipment Description:

Miscellaneous Sealers and Adhesive Application

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 3.5 pounds/gallon, excluding water and exempt solids. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(1)(d)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See b)(2)a below.
c.	OAC rule 3745-21-07(G)	See b)(2)b below.
d.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 4.3 tons per rolling, 12-month period. See b)(2)c below.

- (2) Additional Terms and Conditions
 - a. The coatings employed in this emissions unit are dried at temperatures not exceeding two hundred degrees Fahrenheit.
 - b. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), only materials exempt per OAC rule 3745-21-07(G)(9) or non-photochemically reactive materials shall be applied to non-metal in this emissions unit.



Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- c. The maximum sealer and adhesive coating usage shall be limited by the following formula, calculated as a rolling 12-month period:

$$4.3 \text{ tons VOC / OC} \geq \frac{\sum_{i=1}^n (P_i) \times (\text{VOC}_{pi})}{2000}$$

where:

P_i = Usage of coating i in gallons

VOC_{pi} = VOC content of sealer or adhesive coating i, in pounds VOC per gallon.

- d. To ensure federal enforceability during the first 12 calendar months of this permit, actual VOC emissions calculated from coating material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.

The permittee has existing records of the coating material usage employed on this emissions unit; therefore, the first year of accumulating coating material usage monthly limitations are not necessary.

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. Documentation showing that the material is non-photochemically reactive if applied to non-metal;
 - c. The VOC content of each material, as applied;
 - d. The number of gallons of each material, as applied;
 - e. The total VOC emission rate from all materials applied, in pounds per month;
 - f. The 12-month results of the formula in Section b)(2)c, in tons per year and
 - g. The 12-month rolling VOC emissions from all materials applied, in tons per year.



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 lbs VOC/gal, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of either of the 4.3 tons per rolling, 12-month VOC mass emission limitations or the material usage formula specified in Section b)(2)c.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when a photochemically reactive material or material not exempt under 3745-21-07(G)(9) is applied to non-metal in this emissions unit.
- (4) These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA, Central District Office in accordance with the Standard Terms and Conditions.
- (5) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.

f) Testing Requirements

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

a. Emission Limitation:

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 US EPA Method 24 shall be used to determine the VOC content.

b. Coating Usage Limitation:

VOC emissions shall not exceed 4.3 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit may be determined through the rolling, 12-month records required in Section d)(1) above. The rolling, 12-month emissions from the emissions unit may be calculated by adding the current monthly emissions to the summation of emissions for the previous 11 months.



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g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-07448 issued August 19, 2004.



2. K225, AF Miscellaneous Corrosion Protection/Lubricant

Operations, Property and/or Equipment Description:

AF Miscellaneous Corrosion Protection/Lubricant

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The 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 3745-31-05(D).
b.	OAC rule 3745-21-09(U)(d)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See b)(2)a. below.
c.	OAC rule 3745-21-07(G)	See b)(2)b. below.
d.	OAC rule 3745-31-05(D)	VOC/OC emissions shall not exceed 4.8 tons per rolling, 12-month period. See b)(2)c. below

- (2) Additional Terms and Conditions
 - a. The coatings employed in this emissions unit are dried at temperatures not exceeding two hundred degrees Fahrenheit.



- b. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), only materials exempt per OAC rule 3745-21-07(G)(9) or non-photochemically reactive materials shall be applied in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

- c. The maximum corrosion protectant and lubricant usage shall be limited by the following formula, calculated as a rolling 12-month period:

$$4.8 \text{ tons VOC /OC} \geq \frac{\sum_{i=1}^n (P_i) \times (\text{VOC}_{pi})}{2000}$$

where:

P_i = Usage of protectant or lubricant i in gallons

VOC_{pi} = VOC/OC content of protectant or lubricant i, in pounds VOC/OC per gallon.

- d. To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.

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. Documentation showing that the material is non-photochemically reactive;
 - c. The OC content of each material, as applied;



- d. The number of gallons of each material, as applied; and
 - e. The total OC emission rate from all materials applied, in pounds per month.
- (3) For the purpose of determining compliance with the rolling, 12-month emission limitation, the permittee shall collect and record each month the rolling, 12-month summation of VOC/OC emissions from the corrosion protectants and lubricants materials from the appropriate record keeping requirements listed in terms d)(1) and (2).
- (4) The permittee shall record the results of the formula in Section b)(2)c above from using the appropriate recordkeeping requirements listed in terms d)(1) and (2).
- 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 lbs 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 lbs OC/ gallon when applied to non-metal.
 - (3) The permittee shall submit quarterly deviation (excursion) that identify any exceedance of either of the 4.8 tons per rolling, 12-month VOC/OC mass emissions limitations or the material usage formula specified in Section b)(2)c.
 - (4) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when a photochemically reactive material or material not exempt under 3745-21-07(G)(9) is applied to non-metal in this emissions unit.
 - (5) 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.
 - (6) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15th. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15th of each year.
- f) Testing Requirements
- (1) Compliance with the usage and emission limitations in Section 1b)(1) 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)(1) above. Formulation data from the manufacturer or US 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 of the or US EPA Method 24 shall be used to determine the VOC content.

c. Emission Limitation:

VOC/OC emissions shall not exceed 4.8 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit may be determined through the rolling, 12-month records required in Section d)(3) above. The rolling, 12-month from the emissions unit may be calculated by adding the current monthly emissions to the summation of emissions for the previous 11 months.

g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-07448 issued August 19, 2004.
- (2) Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC rule 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



3. K226, AF Miscellaneous Metal Painting

Operations, Property and/or Equipment Description:

AF Miscellaneous Metal Painting

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The 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 3745-31-05(D) and OAC rule 3745-21-07(G)(2).
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 1.8 tons per rolling, 12-month period. See b)(2)a below.
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hour and 40 lbs/day when using photochemically reactive cleanup materials or applying photochemically reactive materials to non-metal.
d.	OAC rule 3745-21-09(U)	See b)(2)b below.

(2) Additional Terms and Conditions

a. The maximum coating and cleanup material usage shall be limited by the following formula, calculated as a rolling 12-month period:

$$1.8 \text{ ton VOC} \geq \frac{\sum_{i=1}^n (P_i) \times (\text{VOC}_{pi})}{2000}$$



where:

P_i = Usage of coating and cleanup materials i , in gallons

VOC_{pi} = VOC content of coating and cleanup materials i , in pounds VOC per gallon.

- b. Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the limits specified in OAC rule 3745-21-09(U) because the emission unit's maximum daily coating usage is less than ten gallons per day.
 - c. To ensure the federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from the material usage records from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.
- c) Operational Restrictions
- (1) The permittee shall not use more than 10 gallons of coating per day in this emissions unit.
- 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) When coating non-metal parts, the permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed;
 - b. The number of gallons of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. For each day during which a photochemically reactive material (coating or cleanup material) is employed; the total number of hours the emissions unit was in operation; and



- f. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e. (d)/(e), in pounds per hour (average).
- (3) he 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;
 - h. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons;
 - i. The 12-month results of the formula in Section b)(2)a, in tons per year, and
 - j. The 12-month rolling VOC emissions, in tons per year.
- 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.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. For the days during which a photochemically reactive cleanup material was employed and/or a photochemically reactive coating was applied to non-metal, an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. For the days during which a photochemically reactive cleanup material was employed and/or a photochemically reactive coating was applied to non-metal, an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.



- (3) The permittee shall submit quarterly deviation (excursion) that identify any exceedance of either of the 1.8 tons per rolling, 12-month VOC mass emission limitations or the material usage formula specified in Section b)(2)a.
 - (4) The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
 - (5) The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15th. This reporting requirement may be met by including this emissions unit in the annual Fee Emissions Report that is due on April 15th of each year.
- f) Testing Requirements
- (1) Compliance with the emission and usage limitations in Section 1.b)(1) and (2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Usage Limitation:

The total coating usage in this emissions unit shall not exceed 10 gallons per day.

Applicable Compliance Method:

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

8 lbs OC/hour and 40 lbs OC/day when using photochemically reactive cleanup materials or applying photochemically reactive materials to non-metal

Applicable Compliance Method:

Compliance with the hourly and daily OC limits shall be determined through daily Record keeping as specified in d)(2). Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.
 - c. Emission Limitation:

VOC emissions shall not exceed 1.8 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance with this limit may be determined through the rolling, 12-month records required in Section d)(3) above. The rolling, 12-month emissions from the emissions unit may be calculated by adding the current monthly emissions to the summation of emissions for the previous 11 months.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 01-07448
Facility ID: 0180010193
Effective Date: 2/12/2009

g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered 01-07448 issued August 19, 2004.