



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

3/10/2009

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0180010193
Permit Number: P0104533
Permit Type: Administrative Modification
County: Union

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Journal Tribune. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-CDO

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

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Honda of America Mfg., Inc., Marysville Auto Plant

Issue Date: 3/10/2009
Permit Number: P0104533
Permit Type: Administrative Modification
Permit Description: Administrative Mod to P0104138 to change incorrect rule reference and other minor changes. No changes are being made to the federally enforceable limitations.
Facility ID: 0180010193
Facility Location: Honda of America Mfg., Inc., Marysville Auto Plant
24000 Honda Parkway,
Marysville, OH 43040-9251
Facility Description: Automobile Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Natalie Parsons at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Honda Manufacturing in Marysville manufactures vehicles on two assembly lines and has numerous other various assemblies. The facility has numerous emission sources including the Line 1 and Line 2 window install emission sources. These sources were previously permitted, PTI 01-12194, as separate emission sources K221, R019, R020, P331, and P216 for Line 1 and K222, R017, R018, P029, and P008 for Line 2 and consolidated in P0104138(Admin Mod). Honda had requested an Administrative Modification in that the aforementioned sources be consolidated into K221 for Line 1 and K222 for Line 2. The other emission sources listed in permit 01-12194 and Admin Mod P0104138, K227, K228, P004, and P330 did not change but have also been included in the permit P0104533.

3. Facility Emissions and Attainment Status:

Honda is a TV facility for VOCs.

4. Source Emissions:

The aforementioned emission units have a total limit of 39.1 tons per year of VOCs.

5. Conclusion:

This Admin Mod permit was requested from another admin mod P0104138 because of section reference errors and other minor changes. This permit is to consolidate the window install emission units for each assembly line.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>39.1</u>



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

DRAFT

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

Facility ID: 0180010193
Permit Number: P0104533
Permit Type: Administrative Modification
Issued: 3/10/2009
Effective: To be entered upon final issuance



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

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. Federally Enforceable Standard Terms and Conditions 4

 2. Severability Clause 4

 3. General Requirements 4

 4. Monitoring and Related Record Keeping and Reporting Requirements 5

 5. Scheduled Maintenance/Malfunction Reporting 6

 6. Compliance Requirements 6

 7. Best Available Technology 7

 8. Air Pollution Nuisance 7

 9. Reporting Requirements 7

 10. Applicability 8

 11. Construction of New Sources(s) and Authorization to Install 8

 12. Permit-To-Operate Application 9

 13. Construction Compliance Certification 9

 14. Public Disclosure 9

 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission
 Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9

 16. Fees 9

 17. Permit Transfers 10

 18. Risk Management Plans 10

 19. Title IV Provisions 10

B. Facility-Wide Terms and Conditions 11

C. Emissions Unit Terms and Conditions 13

 1. Emissions Unit Group - Main Body Welding Lines: P004, P330, 14

 2. Emissions Unit Group - Wheel Well Blackout: K227, K228, 21

 3. Emissions Unit Group - Window Install Lines: K221, K222, 25



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104533

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0180010193

Facility Description: Motor Vehicles and Car Bodies

Application Number(s): M0000405

Permit Number: P0104533

Permit Description: Administrative Mod to P0104138 to change incorrect rule reference and other minor changes. No changes are being made to the federally enforceable limitations.

Permit Type: Administrative Modification

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 3/10/2009

Effective Date: To be entered upon final issuance

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: P0104533

Permit Description: Administrative Mod to P0104138 to change incorrect rule reference and other minor changes. No changes are being made to the federally enforceable limitations.

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

Group Name: Main Body Welding Lines

Emissions Unit ID:	P004
Company Equipment ID:	Welding Line 2
Superseded Permit Number:	P0104138
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P330
Company Equipment ID:	Welding Line 1
Superseded Permit Number:	P0104138
General Permit Category and Type:	Not Applicable

Group Name: Wheel Well Blackout

Emissions Unit ID:	K227
Company Equipment ID:	Line 1 Wheel Well Blackout
Superseded Permit Number:	P0104138
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K228
Company Equipment ID:	Line 2 Wheel Well Blackout
Superseded Permit Number:	P0104138
General Permit Category and Type:	Not Applicable

Group Name: Window Install Lines

Emissions Unit ID:	K221
Company Equipment ID:	AF Line 1 Body Primer
Superseded Permit Number:	P0104138
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K222
Company Equipment ID:	AF Line 2 Body Primer
Superseded Permit Number:	P0104138
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104533

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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

Draft Permit-to-Install

Permit Number: P0104533

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

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

Draft Permit-to-Install

Permit Number: P0104533

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

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) None.
2. The following emissions units contained in this permit are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR Part 63, Subpart IIII: K222, K221, K227, K228, P004, and P330. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website: <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. The permittee shall monitor the emissions of VOC that is emitted by any emissions units associated with the Line 1 and Line 2 production rate increase permit to install (K221, K222, K227, K228, P004, P330); and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the NSR project increases the design capacity or potential to emit of that regulated NSR pollutant at such emissions unit.
4. If the unit is an existing unit, the permittee shall submit a report to the Ohio EPA, Division of Air Pollution Control, Central District Office if the annual emissions, in tons per year, from Line 1 and Line 2 production rate increase (PTI 01-12194), exceed the baseline actual emissions (as documented and maintained pursuant to paragraph (C)(1)(c) of OAC rule 3745-31-10, by a significant amount for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to paragraph (C)(1)(c) of OAC rule 3745-31-10. Such report shall be submitted to the Ohio EPA, Division of Air Pollution Control, Central District Office within 60 days after the end of such year. The report shall contain the following:
 - a) The name, address and telephone number of the major stationary source;
 - b) The annual emissions as calculated pursuant to Section b)(1); and
 - c) Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0104533

Facility ID: 0180010193

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



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

EU ID	Operations, Property and/or Equipment Description
P004	Weld Line 1: robotic & manual MIG & resistance welding, solder, brazing, sealer application, and miscellaneous organic use in welding
P330	Weld Line 2: 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) 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(D) (Synthetic Minor and to avoid PSD)	Organic compound emissions shall not exceed 11.0 tons per rolling 12 months for welding operations on Line 1 (P330) and Line 2 (P004).
b.	OAC rule 3745-31-05(A)(3)	Weld Line 2 : MIG welding and brazing: Fugitive particulate emissions shall not exceed 0.26 lb/hr and 0.52 ton/yr from Weld Line 1 & Line 2 together Anti-spatter materials and cleaning solutions shall not exceed 4.3 lbs OC/gal. See Sections b)(2)c and c)(1)
c.	OAC rule 3745-21-07(G)	Anti-spatter material and cleaning solution usage: Use of only non-photochemically reactive materials or materials exempt under 3745-21-07(G)(9) See Section b)(2)d. below
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	Miscellaneous sealers/sealants and quality marker coating usage: Use of no more than 10 gallons/day of miscellaneous *sealers/sealants and quality marker coatings
e.	40 CFR Part 63, Subpart IIII	See Section B. 2-4, of the facility wide terms and conditions.



*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. This emissions unit shall use only nonphotochemically reactive materials or materials exempt per OAC 3745-21-07(G)(9) - for antispatter material and cleaning solution usage.
- b. The maximum annual production rate for Line 1 and Line 2 shall not exceed 490,000 units (vehicles), based upon a the rolling, 12-month production of vehicles measured at the AAF Off@.
- c. The annual usage of MIG and brazing wire and rod shall not exceed 443,000 pounds per year on Line 1 and Line 2 together.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c

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.

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:
 - 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 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;
 - c. the total 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;
 - d. the rolling 12-month production of automobiles, measured at the AAF Off@ area; and
 - e. the rolling 12-month OC emissions from welding operations on Line 1 and Line 2.
- (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 permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's AReview of New Sources of Air Toxic Emissions@ policy ("OAC rule 3745-114") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the Aworst case@ usage for this pollutant:

Pollutant: dipropylene glycol monomethyl ether



TLV: 606 mg/m³

Maximum Hourly Emission Rate: 6.43 lbs/hr from both welding Lines 1 and 2

Predicted 1-Hour Maximum Ground-Level Concentration: 1.401 mg/m³

MAGLC: 14.43 mg/m³

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. 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 listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);



- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which include the following:
 - a. any monthly record or calculation showing an exceedance of the 12-month rolling OC emissions limit of 11.0 tons for Line 1 and Line 2 welding operations, and/or the rolling 12-month production of 490,000 units(vehicles) measured at the AAF Off;
 - b. any record showing an exceedance of the annual MIG brazing wire/rod usage of 443,000 pounds per year on welding Lines 1 and 2.
 - c. any occurrence of the use of a photochemically reactive material or material not exempted in 3745-21-07(G)(9), for antisplatter material and cleaning solution usage including an identification of the material used, it's composition, and the day(s) and duration of time the material was used.

These exceedance reports shall be submitted as required in the General Terms and Conditions of this permit.

- (2) The permittee shall notify the Ohio EPA Central District Office in writing of any record showing the use of noncomplying (>4.3 lbs OC/gal) anti-splatter 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.
- (3) 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.
- (4) 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 .



- (5) The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This report may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. Particulate emissions need not be reported, since the potential emissions for this emissions unit is under 1 ton per year from each line.

f) Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

(1) Emission Limitation

11.0 tons OC/rolling, 12-month period for Line 1 and Line 2 welding operations

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of units produced, material usage, the organic compound content of each material used, calculation of the volatile emissions from rust protecting oils from the point of weld (calculated, as shown below), and the rolling 12-month summation of calculated OC emissions (See Section III). Formulation data from the material=s manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the cleaning solutions, anti-spatter materials, sealers/sealants, quality marker coatings, and/or miscellaneous organic materials to be used in the calculation of emissions. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations, from the emissions unit, to the previous 11 month=s emission calculations.

Organic compound emissions from the rust protectant oils at the point of weld, shall be calculated as follows:

$$\text{Annual Emissions} = \text{Area of weld (PiR}^2\text{) or (3.1416)(0.0328 ft}^2\text{) x amount of rust protective oil on metal sheet (275 mg/ft}^2\text{) x (0.0022 lb/1000 mg) x (3,000 welds/car) x (500,000 units and parts on Lines 1 \& 2/yr) x (4 sides/weld) x (1 ton/2000 lbs) = 6.14 tons OC/year}$$

Unless any of the variables in this equation change, the worst case emission calculations from the evaporation of rust-proofing oil(s) at the point of weld, above, shall be used to document the contribution of this source of OC emissions, to this limit.

(2) Emission Limitation

0.26 lb particulate emissions/hr from both Lines 1 and 2

0.52 ton particulate emissions/yr from both Lines 1 and 2

Applicable Compliance Method



Compliance with the particulate limits contained in this permit shall be determined through annual 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 lbs 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 lbs particulate emissions/pound of MIG and brazing wire) X fugitive emissions lost from the baghouse (85%) x (100%-90%)] = 0.26 lbs particulate emissions/hour.

Annual Emissions = [actual or maximum MIG and brazing wire/rod usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X uncaptured fugitive emissions at the point of weld (100%-85%)] + [actual or maximum MIG wire usage (443,000 pounds per year for Line 1 and Line 2) X emission factor from Gradient Corporation and by the American Welding Company (0.01 lbs particulate emissions/pound of MIG wire) X fugitive emissions lost from the baghouse (85%) x (100%-90%)] x [1 ton/2000 lbs] = 0.52 tons particulate emissions/yr.

g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered P0104138 issued January 22, 2009.



2. 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 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 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 1.6 tons/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(C).
b.	OAC rule 3745-31-05(D) (Synthetic Minor and to avoid PSD)	VOC emissions shall not exceed 10.0 tons per rolling 12-month period from the Line 1 and Line 2 wheel well blackout operations, emission units K227 and K228 together. See production operational restriction, Section c)(1) below.
c.	OAC rule 3745-21-09(U)(1)	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.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) from blackout coating overspray shall not exceed 0.551



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		lbs/hr.
f.	40 CFR Part 63, Subpart IIII	See Section B. 2-4, of the facility wide terms and conditions.

(2) Additional Terms and Conditions

None

c) Operational Restrictions

- (1) Line 1 and Line 2 wheel well blackout operations, K227 and K228 together, shall be included in the production Line 1 and Line 2 total rolling twelve-month production limit of 490,000 units (vehicles), measured at "assembly off" (AF Off).
- (2) The permittee shall operate the fabric filter system whenever this emissions unit is in operation.
- (3) 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 in PTI #01-6743.

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); and
 - e. the rolling 12-month VOC emissions from all blackout process coatings employed in K227 and K228 together.

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



- (3) This facility shall maintain the following records, as of the last day of each calendar month, for production Lines 1 and 2, which includes K227 and K228 wheel well blackout operations:
 - a. the number of units (vehicles produced on Lines 1 and 2, as measured at "assembly off" (units/month); and
 - b. the rolling, 12-month summation of units produced on Lines 1 and 2 together (vehicles per rolling 12 months).
- (4) 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.

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 0.62 pounds of VOC per gallon, as applied. 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 record showing that the dry filtration 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 Central District Office within 30 days following the end of the calendar month.
- (3) The permittee shall submit annual reports for emission units K227 and K228 which specify total VOC emissions from these two emission units for the previous calendar year. These reports shall be submitted by April 15 of each year. The reporting requirements for these emission units may be satisfied by including them in the annual Fee Emission Report.
- (4) The permittee shall submit quarterly deviation (excursion) reports which identify any monthly record showing an exceedance of the 12-month rolling production limitation of vehicles, on Lines 1 and 2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I of the General Term and Conditions.
- (5) Quarterly deviation reports for rolling, 12-month VOC limitation for K227 and K228.

f) Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

(1) Emission Limitation

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

Applicable Compliance Method 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 USEPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

(2) Emission Limitation

10.0 tons VOC/rolling, 12-month period for emission units K227 and K228 together.

Applicable Compliance Method

Compliance with this limit shall be determined through the monthly recordkeeping, as specified in Section d)(2). Formulation data from the coating's manufacturers or USEPA Method 24 shall be used to determine the volatile organic compound content of the blackout coatings, to be used in the calculation of emissions.

(3) Emission Limitation

Visible particulate emissions 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).

(4) Emission Limitation

0.551 pounds particulate emissions/hr 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)(2), d)(4), and e)(2) of Part 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).

(5) Emission Limitation

1.6 tons particulate emissions/yr from coating overspray

Applicable Compliance Method

Compliance with this limit shall be based on meeting the requirements for the dry filtration control system specified under Sections c)(2), d)(4), and e)(2) of Part C and recordkeeping of the monthly usage of the coatings applied, and annual calculation of emissions.

g) Miscellaneous Requirements

- (1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered P0104138 issued January 22, 2009.



3. 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 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 requirements established pursuant to this rule include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor and to avoid PSD)	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. See Sections b)(2)a. and c)(1) below.
c.	OAC rule 3745-21-07(G)	None when coating non-metal; see Section b)(2)b. and b)(2)c. below.
d.	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.
e.	OAC rule 3745-21-09(U)(i)	When applying adhesives to metal, the VOC content of any adhesive employed in this emission unit shall not exceed 3.0lbs/gallon, excluding water and exempt solvents.
f.	40 CFR Part 63, Subpart IIII	See Section B. 2-4, of the facility wide terms and conditions.



(2) Additional Terms and Conditions

- a. All cleanup materials associated with this operation are accounted for by emissions unit P223 (assembly miscellaneous solvents) under PTI 01-6323.
- 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 parts in this emissions unit.

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

- c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c, d)(4), e)(3)c.

c) Operational Restrictions

- (1) Emissions units K221 (Line 1 with off-line repair) and K222 (Line 2) shall be limited to a combined production rate of 490,000 units (vehicles) per rolling, 12-month period. The total production rate shall be measured at the assembly off area (AF Off) for Lines 1 and 2.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month:
 - a. the name and identification of each coating, glass and body primer, adhesive, 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:
 - 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 maintain monthly records of the following for emissions units K221 (Line 1 with off-line repair) and K222(Line 2):
 - a. the total combined production rate, in units (vehicles); and
 - b. the rolling, 12-month combined production rate, in units (vehicles).
 - (4) The permittee shall maintain records for each material applied to non-metal in this emissions unit that indicate whether or not the material is a photochemically reactive material.
 - (5) 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.
- 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 lbs 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 the following:
 - a. 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);
 - b. any exceedances of the rolling, 12-month combined production rate (vehicles, measured at AF Off) for emissions units K221 (Line 1 with off-line repair) and K222 (Line 2); and
 - c. all periods of time when a photochemically reactive material was applied to non-metal in this emissions unit. The quarterly deviation reports shall be submitted in accordance with General Term and Condition Section A.
 - (4) The permittee shall also submit annual reports that specify the total OC/VOC emissions from emissions units K221 (Line 1 with off-line repair) and K222 (Line 2) for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting



requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

f) Testing Requirements

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

(1) 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).

(2) Emission Limitation:

The usage of body primer in this 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)(5).

(3) Emission Limitation:

Organic compound/volatile organic compound (OC/VOC) emissions from all coatings, glass and body primers, adhesives, and wiping solvents employed in this 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).

(4) 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.

g) Miscellaneous Requirements

(1) This Permit to Install (PTI) shall supercede the requirements for this emissions unit in the PTI numbered P0104138 issued January 22, 2009.