State of Ohio Environmental Protection Agency

STREET ADDRESS:
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Columbus, Ohio 43215

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

1/13/2010

Certified Mail

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

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0546000117
Permit Number: P0105436
Permit Type: OAC Chapter 3745-31 Modification
County: Logan

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, Bellefontaine Examiner. 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.ohio.gov 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, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-SWDO; Indiana

Permit Strategy Write-Up

1. Check all that apply:

   ___ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   K001, is an EDP coating operation at Honda of America's East Liberty, Ohio's Vehicle Assembly Plant. In the past, these type of emissions units were assumed to have a 70% capture of the free solvents within the coatings and additives in the drying oven. Over the years, Honda has studied this and has discovered that the VOC's that were being emitted within the oven were not from the volatiles in the coatings and additives, rather they were from the solids being cured. Honda determined that a certain percentage of the solid materials that were being cured were volatilizing into VOC and being emitted. Honda has assumed ~ 95% of the volatilizing VOC's are captured in the oven and ducted to an incinerator. The other 5% is emitted after the vehicle body leaves the oven.

3. Facility Emissions and Attainment Status:

   Honda East Liberty is a Major Federal Facility for both Title V and PSD. It is located in Logan County which is attainment for all regulated pollutants.

4. Source Emissions:

   The allowable emissions from K001 will increase from 0.52 lb/gallon of applied solids to 0.7 lb/gallon of applied solids from the free VOC's and 1.0 lb/gallon of applied solids from combined free and cured VOC's. Although this is an increase in the allowable it is still well under NSPS limit of 1.42 lb/gallon of applied solids. The potential hourly emissions increase from 23.25 lbs VOC per hour to 50.85 lbs VOC per hour

   The overall annual emissions from this emissions unit will not change. The annual emissions are limited along with K002, K003 and K005 - K012, excluding cleanup/purge material usage, shall not exceed 1268.65,; while the cleanup/purge emissions are combined with K002 - K003, K005 - K012, P001, P003 , P004, P014, P016 and P017, to not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation

5. Conclusion:

   The use of an incinerator to reduce the emissions from the drying oven and the record keeping and reporting requirements, these additional emissions and limitation changes appear to be in compliance with all applicable regulations.

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

Pollutant	Tons Per Year
VOC w/out cleanup	1268.65*
VOC from cleanup	103.3**

VOC from incinerator	0.22
NOX from incinerator	4.38
CO from incinerator	3.55
SO2 from Incinerator	0.26
PE/PM10	0.22

Logan County

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

Issue Date: 1/13/2010
Permit Number: P0105436
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: This permit is to address an emissions increase discovered by Honda on their EDP Coating line. Additional VOC are being emitted from the curing of the coating and additive materials in the drying oven. the permit will also address a change from an assumed 70% capture of the free solvent in the coatings and additives in the coating to 0%. These changes will increase the allowable lbs of VOC/gal of solids applied, but will not exceed the NSPS standard.
Facility ID: 0546000117
Facility Location: HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347,
East Liberty, OH 43319-9407
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 Craig Osborne at Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street or (937)285-6357. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

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

Facility ID: 0546000117
Permit Number: P0105436
Permit Type: OAC Chapter 3745-31 Modification
Issued: 1/13/2010
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, EAST LIBERTY PLANT

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Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0038239
Permit Number: P0105436
Permit Description: This permit is to address an emissions increase discovered by Honda on their EDP Coating line. Additional VOC are being emitted from the curing of the coating and additive materials in the drying oven. the permit will also address a change from an assumed 70% capture of the free solvent in the coatings and additives in the coating to 0%. These changes will increase the allowable lbs of VOC/gal of solids applied, but will not exceed the NSPS standard.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/13/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0105436
Permit Description: This permit is to address an emissions increase discovered by Honda on their EDP Coating line. Additional VOC are being emitted from the curing of the coating and additive materials in the drying oven. the permit will also address a change from an assumed 70% capture of the free solvent in the coatings and additives in the coating to 0%. These changes will increase the allowable lbs of VOC/gal of solids applied, but will not exceed the NSPS standard.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	EDP Coating Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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, Southwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southwest District Office. The written reports shall be submitted (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, Southwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

6. Compliance Requirements

a) 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, Southwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted

(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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southwest 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.

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 are facility-wide terms and conditions:

a) The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart IIII--Automobile and Light-Duty Truck Surface Coating: K001; K002; K003; K005; K006; K007; K008; K009; K011; K012; K013; and K024.

C. Emissions Unit Terms and Conditions

1. K001, EDP Coating Line

Operations, Property and/or Equipment Description:

EDP coating line

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 1.12 lbs/gallon of coating, as applied excluding water and exempt solvents (free solvent). Emissions from natural gas combustion in the drying oven and the incinerator: 0.05 lb PM10/hr; 0.06 lb SO2/hr; 1.00 lb NOx/hr; 0.81 lb CO/hr; and 0.05 lb VOC/hr. See Sections b)(2)a., b., e. through g., c)(1) thru (4), d)(1), (2), (8), and (9), e)(1) thru (5), f)(1)a., b., and f., f)(2), f)(4), and f)(5), below.
b.	OAC rule 3745-31-05(D) (In order to minimize VOC emissions and avoid PSD requirements).	See Sections b)(2)c. and d., c)(3), d)(10), e)(1), f)(1)c., and d., below.
c.	OAC rule 3745-21-09(C)(1)(a)	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 3745-21-08(B)	See Section b)(2)e. below.
e.	OAC rule 3745-18-06(E)	The emission limitation specified by this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-11(B) (for the direct-fired ovens associated with this emissions unit)	See Section b)(2)h, below.
g.	OAC rule 3745-17-07(A) (for direct-fired ovens associated with this emissions unit)	See Section b)(2)i, below.
h.	OAC rule 3745-17-10(B) (for the indirect-fired ovens associated with this emissions unit)	The PE limitation required pursuant to this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-17-07(A) (for indirect-fired ovens associated with this emissions unit)	Visible PE from any stack serving an indirect-fired oven zone associated with this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. See Section f)(1)e., below.
j.	40 CFR 60, Subpart MM	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
k.	40 CFR Part 63, Subpart IIII (40 CFR 63.3080-3176)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3091. Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. See Sections c)(5), d)(11), e)(5) and f)(3), below.

(2) Additional Terms and Conditions

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

emissions from the oven curing process are referred to as "cure volatiles" for the purposes of this permit.

b. This emissions unit shall not exceed the following:

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

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

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

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

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

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

iii. When the solids turnover ratio (R_T)* is less than 0.040:

(a) No free solvent or total VOC emission limitation is applicable.

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

c. The total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, shall not exceed 1268.65 tons per rolling, 12-month summation.

d. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 , P004, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

e. The design of the emissions unit and the technology associated with current operating practices will satisfy "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

f. VOC emissions from the e-coat oven shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight. The permittee shall operate the thermal incinerator whenever the e-coat oven is processing units (vehicles).

The thermal incinerator shall meet the operational, monitoring, and record keeping requirements of this permit.

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

h. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven and the incinerator were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

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

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

c) Operational Restrictions

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

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

(3) The total number of units processed through this emissions unit shall not exceed 31,000 units per month and 267,000 units per rolling, 12-month summation.

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

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

d) Monitoring and/or Recordkeeping Requirements

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

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

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

(2) The permittee shall maintain the following monthly records on all materials employed in this emissions unit:

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

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

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

d. the total VOC emissions from all coatings and solvent employed, (excluding cleanup and purge materials maintained in d)(4) and d(5) in pounds per month, i.e., the summation of the materials employed ("b" x "c"));

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

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

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

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

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

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

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

l. the turnover ratio (R_T) as determined by dividing the total volume of coating solids added to the e-coat system in a month by the volume design capacity (ie, the total liquid volume contained in the e-coat system's tanks, pumps, recirculating lines, filters, etc. at the system's designed liquid operating level), in gallons; and

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

**The permittee shall maintain records for the e-coat process that will enable the permittee to calculate the cure volatile VOC emissions, in pounds per gallon, from the coatings (paste and resin e-coat blend). The cure volatiles for the coatings shall be calculated by subtracting the free solvent VOC content, as

determined by formulation data or U.S. EPA Method 24, from the total VOC content, as determined by a Modified Method 24 adjusted for a higher curing oven temperature.

Cure Volatiles = Total VOC – Free Solvent.

(3) Air emissions from cleanup/purge material usage, associated with the operations at this facility, including any recovered material to be credited to the emissions, shall be calculated, recorded, and reported for demonstration of compliance with and covered under the rolling, 12-month VOC limitations.

(4) The permittee shall maintain monthly records which list the following information for the combined cleanup and purge material employed in the emissions units at this facility:

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

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

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

d. the total VOC emissions from all cleanup/purge material employed, prior to any credit for recovered materials, in pounds or tons per month, i.e., the summation of the products of the amounts (c) of all cleanup materials and purge materials applied (a) in the emissions units at this facility.

(5) The permittee shall maintain the following monthly records on the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012:

a. the amount of VOC emitted to the ambient air from each above listed emissions unit, tons per month;

b. the total combined VOC emitted, in tons per month (the summation of "a" from each above listed emissions unit); and

the rolling, 12-month total combined VOC emitted from the above listed emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("b") plus the total amount of VOC emissions for the 11 previous calendar months).

(6) The permittee shall maintain the following monthly records on the combined volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017:

a. the name and identification number of each volatile liquid organic cleanup material employed;

b. the VOC content for each volatile liquid organic cleanup material employed, in pounds per gallon;

c. the volume, in gallons, of each volatile liquid organic cleanup material employed;

d. the total VOC emission rate, in tons, i.e, the summation of (b x c) for each volatile liquid organic cleanup material employed divided by 2000 lbs/ton; and

e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and the rolling, 12-month total combined VOC emitted from the above listed emissions units at this facility, in tons (the total VOC emitted, in tons, for the current month ("d") plus the total amount of VOC emissions for the 11 previous calendar months).

(7) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (see b)(1) above):

a. the date the recovery tank was emptied;

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

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

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

e. the total VOC emissions (in pounds or tons) from recovered materials (cleanup and purge), to be credited against the total VOC emissions from all coatings, reducing solvents, and other materials applied in emissions units at this facility and from the cleanup and purge materials applied in the emissions units listed in sections d)(4) and (5), above.

(8) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the oven associated with this emissions unit is processing units, units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the oven associated with this emissions unit is processing units, was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

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

(10) The permittee shall maintain the following monthly records on the number of units processed:

a. the total number units processed during the calendar month; and

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

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

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. the VOC emissions rate, in pounds of “free” solvent VOC emitted per gallon of applied solids, is greater than the allowable emission rate as determined by sections b)(2)b. and c)(5) and recorded by section d)(2) of this permit;

b. the VOC emissions rate, in pounds of “total” (“free” plus “cured”) VOC emitted per gallon of applied solids, is greater than the allowable emission rate as determined by sections b)(2)b. and c)(5) and recorded by section d)(2) of this permit;

c. the combined VOC emissions (not including those emitted from the use of liquid organic cleanup material) from emissions units K001-K003, and K005-K012 exceed 1,268.65 tons per rolling 12-month period;

d. the combined VOC emissions from the use of volatile liquid organic cleanup material employed in emissions units K001-K003, K005-K012, P001, P003-P005, P014, P016, and P017 exceed 38.44 tons per month and 103.3 tons per rolling 12-month period; and

e. the combined number of units processed is greater than 31,000 units per month and 267,000 units per rolling, 12-month summation.

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

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

(3) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(2), above.

These reports shall be due by the dates specified in this permit.

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

(5) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(6) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automoble and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.

f) Testing Requirements

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

a. Emission Limitations:

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

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

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

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

Applicable Compliance Method:

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

procedures shall follow those specified in paragraph (B)(8) of OAC rule 3745-21-10, for Cvoc2.

c. Emission Limitations:

38.44 tons VOC per month from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined,

103.3 tons VOC per rolling, 12-month summation from the liquid organic cleanup/purge materials for emissions units K001 - K003, K005 - K012, P001, P003 thru P005, P014, P016 and P017, combined.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in d)(5), of this permit.

d. Emission Limitations:

1268.65 tons VOC per rolling, 12-month summation, for emissions units K001 - K003, K005 - K012 combined, excluding cleanup/purge materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements established in Section d)(6), of this permit.

through the record keeping requirements established in d)(5), of this permit.

e. Visible Emission Limitation:

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

Applicable Compliance Method:

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

f. Emission Limitations:

0.05 lb PM10/hr;

0.06 lb SO2/hr;

1.00 lb NOx/hr;

0.81 lb CO/hr; and

0.05 lb VOC/hr.

Applicable Compliance Method:

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

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

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

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

a. Destruction efficiency and capture efficiency testing shall be conducted within 6 months prior to the expiration of the Title V permit for this facility, unless an alternative schedule is submitted and approved by the Ohio EPA. and/or the Ohio EPA requests earlier testing. In addition, an initial capture efficiency test shall be conducted within 12 months of the final issuance of this permit.

b. Emission testing shall be conducted to determine the destruction efficiency of the incinerator (i.e., the percent reduction in mass emissions between inlet and outlet) The destruction efficiency testing was last conducted on August 19, 2009.

c. Emission testing shall be conducted to determine the capture efficiency of cure volatiles in the e-coat oven for this emissions unit, (at present the capture efficiency is assumed to be 95%, based on best engineering assumptions).

d. The following test methods shall be employed to demonstrate compliance:

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

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

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

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

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

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

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

(3) Emission Limitation:

The combined hazardous air pollutant (HAP) emissions to the atmosphere from electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to §63.3082(c) to no more than 0.072 kg/liter (0.60 lb/gal) of coating solids deposited during each month, determined according to the requirements in §63.3161.

Applicable Compliance Method:

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

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

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

g) Miscellaneous Requirements

(1) None.