



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/8/2010

Certified Mail

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

Facility ID: 0546000117
Permit Number: P0104750
County: Logan

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Bellefontaine Examiner. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. 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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-SWDO; Indiana

PUBLIC NOTICE
Issuance of Draft Air Pollution Title V Permit
HONDA OF AMERICA, EAST LIBERTY PLANT

Issue Date: 9/8/2010
Permit Number: P0104750
Permit Type: Renewal
Permit Description: Auto Assembly Plant
Facility ID: 0546000117
Facility Location: HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347,
East Liberty, OH 43319-9407
Facility Description: Automobile Manufacturing, Light Truck and Utility Vehicle 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 Title V operating permit for the facility at the location identified above on the date indicated. 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, Dayton, OH 45402 or (937)285-6357. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.ohio.gov/dapc



Statement of Basis For Title V Permit

Part I - General	
Company Name	Honda of America, East Liberty Vehicle Assemble Plant
Premise Number	0546000117
What makes this facility a Title V facility?	This facility is a major facility for volatile organic compound s (VOC)
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a	N/A



reopening per OAC rule 3745-77-08(D)	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	During the effective time period of the initial Title V, this facility has had 7 PTI's issued and 1 Significant Title V modification. The PTI's are: 05-07923; 05-10278; 05-13448; 05-13872; 05-14163; P0105010; and P0105011. The special terms and conditions developed in these PTI's will be incorporated into this Title V renewal.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
The fuels employed at this facility, excluding the vehicle filling operation, shall not exceed the following: 1500 million cubic feet of natural gas, as a rolling, 12-month summation; 1.0 million gallons of No. 2 fuel oil, as a rolling, 12-month summation; and 0.5%, by weight, sulfur content for the No. 2 fuel oil employed.	31-05(D)		To Avoid PSD threshold from products of combustion
The permittee shall maintain monthly records of the following information for the facility: The natural gas usage, in million cubic feet; the No. 2 fuel oil usage, in gallons; The percent sulfur content, by weight, for the No. 2 fuel oil employed; The rolling, 12-month summation of the monthly natural gas usage rates; and The rolling, 12-month summation of the monthly No. 2 fuel oil usage rates.	31-05(D)		



<p>For each shipment of oil received for burning, the permittee shall maintain records of the total quantity of oil received the permittee's or oil supplier's analyses for sulfur content and heat content. A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.</p>	31-05(D)		
<p>The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.</p>	31-05(D)		
<p>The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage limitation of 1500 million cubic feet, the rolling, 12-month No. 2 fuel oil usage limitation of 1.0 million gallons, and/or the No. 2 fuel oil sulfur content limitation of 0.5%, by weight.</p> <p>These reports shall be due by the date described in this permit.</p>	31-05(D)		
<p>Compliance with the emission limitation(s) in these terms and conditions shall be determined in accordance with the following method(s):</p> <p>Sulfur Content Limitation: 0.5%, by weight sulfur content</p> <p>Applicable Compliance Method:</p> <p>The permittee shall demonstrate compliance with the sulfur content limitation above based on the record keeping requirements established in this permit.</p>	31-05(D)		



<p>Operational Restrictions:</p> <p>1500 million cubic feet of natural gas/rolling, 12-month summation 1.0 million gallons of no. 2 fuel oil/rolling, 12-month summation</p> <p>Applicable Compliance Method:</p> <p>The permittee shall demonstrate compliance with the operational restrictions above based on the record keeping requirements established in this permit.</p>	31-05(D)		
<p>For the purposes of this permit, references to particulate emissions (PE) refers to the definition in OAC rule 3745-17-01(B)(11). Per OAC rule 3745-17-11, PE is defined as, "particulate matter measurable by the applicable test methods in 'Appendix A' of 40 CFR Part 60 'Standards of Performance for New Stationary Sources,' as such appendix existed on July 1, 1996."</p>	17-11		
<p>The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart PPPP-- Plastic Parts Surface Coating (see attached): K015; and P020</p>		40 CFR, Part 63, Subpart PPPP	
<p>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.</p>		40 CFR, Part 63, Subpart IIII	

• **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)



Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
B004: Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler	The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit	31-05(A)(3)		n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	The quality of the oil burned in this emissions unit shall meet the following specifications on a monthly basis: sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and sulfur content of 0.5%.			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.	31-05(D)		n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	0.020 lb PE per mmBtu of actual heat input	17-10(B)(1)		n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)		n	n	n	n	n	n	n	n	n	n	n	If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).



1.6 lbs SO2/mmBtu of actual heat input	18-06 (D)		n	y	y	n	n	y	m	n	n	n	n	Compliance recordkeeping requirements.	based and	on report
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EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments		
		SIP (3745-)	Other														
B005: Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler	The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit	31-05(A)(3)		n	y	y	n	n	y	m	n	n	n	n	Compliance recordkeeping requirements.	based and	on report
	The quality of the oil burned in this emissions unit shall meet the following specifications on a monthly basis: sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and sulfur content of 0.5%.			n	y	y	n	n	y	m	n	n	n	n	Compliance recordkeeping requirements.	based and	on report
	The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.	31-05(D)		n	y	y	n	n	y	m	n	n	n	n	Compliance recordkeeping requirements.	based and	on report
	0.020 lb PE per mmBtu of actual heat input	17-10(B)(1)		n	y	y	n	n	y	m	n	n	n	n	Compliance recordkeeping requirements.	based and	on report
	Visible PE from the stack shall not exceed 20 percent opacity, as	17-07(A)		n	n	n	n	n	n	n	n	n	n	n	If required, compliance shall be determined through visible		



	a 6-minute average, except as provided by rule.																	emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
	1.6 lbs SO2/mmBtu of actual heat input	18-06 (D)		n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	<u>Comments</u>			
		SIP (3745-)	Other															
B006: Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler	The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit	31-05(A)(3)		n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.
	The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis: sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and sulfur content of 0.5%.			n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.
	The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.	31-05(D)		n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.
	0.020 lb PE per mmBtu of actual heat input	17-10(B)		n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.



	1)																	
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)		n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
1.6 lbs SO2/mmBtu of actual heat input	18-06(D)		n	y	y	n	n	y	m	n	n	n	n	n	n	n	n	Compliance based on recordkeeping and report requirements.

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
B035, Generator #2 1135 hp, Emergency generator	Hourly Emissions shall not exceed:	31-05(A)(3)		n	n	n	n	n	n	n	n	n	n	n	Limits are based on BAT limits on hours of operation and fuel quality limitations
	24 lbs of NOx; 6.4 lbs of CO; 0.6 lbs of VOC; 2.7 lbs of PE; and/or 3.8 lbs of SO2.			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation.			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
Rolling 12-mth Emissions shall not exceed:	31-05(D)		n	n	n	n	n	n	n	n	n	n	n	Limits are based on BAT limits on hours of operation and fuel quality limitations	



	6.0 tons of NOx; 1.59 tons of CO; 0.15 tons of VOC; 0.68 tons of PE; and/or 0.95 tons of SO2.																	
	Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)		n	n	n	n	n	n	n	n	n	n	n	n	n		If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
	PE shall not exceed 0.062 lb/mmBtu of actual heat input.	17-11(B)(5)(b)		n	n	n	n	n	n	n	n	n	y	n				Compliance is assumed based on fuel limitations.
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	<u>Comments</u>			
		SIP (3745-)	Other															
B035, Generator #2 1232 hp, Emergency generator	Hourly Emissions shall not exceed: 28.5 lbs of NOx; 7.64 lbs of CO; 0.7 lbs of VOC; 3.2 lbs of PE; and/or 4.5 lbs of SO2.	31-05(A)(3)		n	n	n	n	n	n	n	n	n	n	n				Limits are based on BAT limits on hours of operation and fuel quality limitations
	The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation.			n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.
	The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur			n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.



content of 0.5% or less																			
Rolling 12-mth Emissions shall not exceed: 7.12 tons of NOx; 1.9 tons of CO; 0.18 tons of VOC; 08 tons of PE; and/or 1.13 tons of SO2.	31-05(D)		n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	Limits are based on BAT limits on hours of operation and fuel quality limitations
Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)		n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
PE shall not exceed 0.062 lb/mmBtu of actual heat input.	17-11(B)(5)(b)		n	n	n	n	n	n	n	n	n	n	y	n					Compliance is assumed based on fuel limitations.

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
F096, Roadways and Parking Areas	PE) shall not exceed 23.22 tons per year.	31-05(A)(3)		n	n	n	n	n	n	n	n	n	y	n	Compliance will be assumed based on recordkeeping and reporting on control measures and visible emissions
	(PM10) shall not exceed 5.25 tons per year			n	n	n	n	n	n	n	n	n	y	n	Compliance will be assumed based on recordkeeping and reporting on control measures and visible emissions



EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
	Visible emissions from any paved roadway or parking area shall not exceed 1 minute during any 60-minute observation period.			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	Visible emissions from any paved roadway or parking area shall not exceed 3 minute during any 60-minute observation period.			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
K001, EDP Coating Line	VOC emissions from the "free" solvents* shall not exceed 0.7 lb/gallon of applied solids, as a monthly volume weighted average. (This emission limitations may be modified according to the requirements in section c)(5) of permit P0105436).	31-05(A)(3)		n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	"Total" VOC emissions ("free" plus "cured") shall not exceed 1.0 lb/gallon of applied solids, as a monthly volume weighted average. (This emission limitations may be modified according to the requirements in section c)(5) of permit P0105436).			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
	Volatile organic compound (VOC) emissions shall not exceed 1.12			n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.



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.																		requirements.
		n	y	y	n	n	y	m	n	n	n	n	n	n	n	n	n	Compliance based on recordkeeping and report requirements.
	40 CFR Part 60, Subpart MM Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations	Part 60, Subpart MM	n	y	y	n	n	y	m	n	n	n	n	n	n	n	n	n
40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)	Part 63 Subpart IIII	n	y	y	n	n	y	m	n	n	n	n	n	n	n	n	n	Compliance based on recordkeeping and report requirements. The requirements under OAC rule 3745-31-05(A)(3)

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
K002, Sealer/De adener	Volatile organic compound (VOC) emissions shall not exceed 14.1 lbs per hour.	31-05(A)		n	n	n	n	n	m	n	n	n	y	n	The 14.1 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to



EU(s)	Limitation	Basis	N	O	M	S	E	R	S	R	S	E	M	Comments	
Coating line		3)												emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.	
	Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator :		n	n	n	n	n	m	n	n	n	y	n	Compliance is assumed based on potential and the use of natural gas.	
	0.06 lb PE(filterable)/hr; 0.02 lb SO ₂ /hr; 3.3 lbs NO _x /hr; 2.8 lbs CO/hr; and 0.2 lb VOC/hr														
	The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
	The permittee shall burn only natural gas in this emissions unit.			n	y	y	n	n	y	n	y	n	n	n	Compliance based on record keeping
	The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.	21-09(U)(1)(i)		n	y	y	n	n	y	n	y	n	n	n	Compliance based on record keeping
40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)		Part 63 Subpart IIII	n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.	



		SIP (3745-)	Other														
K003, Guidecoat Line	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007.	31-05(A)(3)		n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements		
	149.9 lbs VOC per hour.			n	n	n	n	n	m	n	n	n	y	n	The 149.9 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit.		
	5.4 pounds of particulate emissions (PE) per hour, from overspray			n	y	y	n	n	y	n	y	n	y	n	Use of and maintenance of overspray water curtain. Compliance based on monitoring records and periodic testing.		
	The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.		
	Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.20 lb PM10/hr 0.02 lb SO2/hr 4.05 lbs NOx/hr 3.40 lbs CO/hr 0.21 lb VOC/hr			n	n	n	n	n	m	n	n	n	y	n	Compliance is assumed based on potential and the use of natural gas.		
The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than		40	CF R,											Compliance with BAT requirements.			



<p>5.13 lbs NOx/hr; 4.31 lbs CO/hr; and 0.27 lb VOC/hr.</p>													
<p>The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.</p>		n	y	y	n	n	y	n	y	n	y	n	<p>Compliance based on monitoring records and periodic testing.</p>
<p>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.</p>		n	y	y	n	n	y	n	y	n	y	n	<p>Compliance based on monitoring records and periodic testing.</p>
<p>The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.</p>		n	y	y	n	n	y	n	y	n	y	n	<p>Compliance based on monitoring records and periodic testing.</p>
<p>Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule</p>	<p>17-07(A)(1)</p>	n	y	y	n	n	y	n	y	n	y	n	<p>Compliance based on monitoring records and periodic testing.</p>
<p>The use of an overspray control system</p>	<p>17-11(C)</p>	n	y	y	n	n	y	n	y	n	n	n	<p>Compliance based on monitoring records and periodic testing.</p>
<p>15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008,</p>	<p>21-09(C)(1)(c)</p>	n	y	y	n	n	y	n	y	n	y	n	<p>Compliance based on monitoring records and periodic testing.</p>



	K009 and K012, combined). 1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).		40 CFR, Part 60, Subpart M	n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
	40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)		Part 63 Subpart IIII	n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	<u>Comments</u>
		SIP (3745-)	Other												
K006, Topcoat Coating Line B	Hourly emissions from the coating operation shall not exceed: 214.64 lbs VOC; and/or 10.8 lbs of particulate emissions (PE), from overspray.	31-05(A)(3)		n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit.
	Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:			n	n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.



<p>0.26 lb PM10/hr; 0.031 lb SO2/hr; 5.13 lbs NOx/hr; 4.31 lbs CO/hr; and 0.27 lb VOC/hr.</p>														
<p>The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.</p>			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
<p>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.</p>			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
<p>The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.</p>			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
<p>Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule</p>	17-07(A)(1)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
<p>The use of an overspray control system</p>	17-11(C)		n	y	y	n	n	y	n	y	n	n	n	Compliance based on monitoring records and periodic testing.
<p>15.1 lbs VOC/gallon of applied solids, as a daily, volume-</p>	21-09(n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.



weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).	C)(1)(c)																
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).		40 CFR, Part 60, Subpart M	n	y	y	n	n	y	n	y	n	y	n				Compliance based on monitoring records and periodic testing.
40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)		Part 63 Subpart IIII	n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
K007, Primary Topcoat On-Line Repair	1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily volume weighted average, from all primer/surfacer coating operations in emissions units K003 and K007.	31-05(A)(3)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.



89.3 lbs VOC per hour			n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit.
5.19 pounds of particulate emissions (PE) per hour, from overspray			n	y	y	n	n	y	y	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit. Maintenance of the water curtain to minimize the release of overspray
Emissions from natural gas combustion in the drying oven: 0.20 lb PM10/hr 0.02 lb SO2/hr 4.05 lbs NOx/hr 3.40 lbs CO/hr 0.21 lb VOC/hr			n	n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.
Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)(1)		n	n	n	n	n	m	n	n	n	y	n	If required testing based on Method 9.
The use of an overspray control system	17-11(C)		n	y	y	n	n	y	y	n	n	y	n	Maintenance of the water curtain to minimize the release of overspray
15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).	21-09(C)(1)(c)		n	y	y	n	n	y	n	y	n	n	n	Compliance based on monitoring records.
40 CFR Part 63, Subpart III, (Surface Coating of Automobile and Light-Duty Trucks)		Part 63 Subpart	n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.



EU(s)	Limitation	Basis		III												Comments
		SIP (3745-)	Other	N	O	M	S	E	R	S	R	S	E	M		
K008, Secondary Topcoat On-Line Repair	The emissions from this emissions unit shall not exceed: 8.7 lbs volatile organic compounds (VOC) per hour ; and/or 0.42 pounds of particulate emissions (PE) per hour, from overspray.	31-05(A)(3)		n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit. Maintenance of the water curtain to minimize the release of overspray	
	Emissions from natural gas combustion in the drying oven, and the air supply houses for emissions units K007 and K008, combined, shall not exceed the following: 0.21 lb PM10/hr; 0.025 lb SO2/hr; 4.08 lbs NOx/hr; 3.43 lbs CO/hr; and 0.22 lb VOC/hr.			n	n	n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.
	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)(1)		n	n	n	n	n	m	n	n	n	y	n	If required testing based on Method 9.	
	The use of an overspray control system	17-11(C)		n	y	y	n	n	y	y	n	n	y	n	Maintenance of the water curtain to minimize the release of overspray	
15.1 lbs VOC/gallon of applied	21-		n	y	y	n	n	y	n	y	n	n	n	Compliance based on monitoring		



solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).	09(C)(1)(c)															records.
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).		40 CFR, Part 60, Subpart MM	n	y	y	n	n	y	n	y	n	y	n			Compliance based on monitoring records and periodic testing.
40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)		Part 63 Subpart IIII	n	y	y	n	n	y	m	n	n	n	n			Compliance based on recordkeeping and report requirements.

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
K009, Wax/Polish Coating Line	The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted	31-05(A)(3)		n	y	y	n	n	y	n	y	n	n	n	Compliance based on monitoring records.



average of all the coatings employed in this emissions unit.																
The emissions from this emissions unit shall not exceed: 87.2 lbs VOC per hour; and 0.29 lb particulate emissions (PE) per hour, for over spray			n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit. Maintenance of the water curtain to minimize the release of overspray		
Emissions from natural gas combustion in the air supply houses: 0.07 lb PM10/hr; 0.009 lb SO2/hr; 1.49 lbs NOx/hr; 1.25 lbs CO/hr; and 0.08 lb VOC/hr			n	n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.		
Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)(1)		n	n	n	n	n	m	n	n	n	y	n	If required testing based on Method 9.		
The use of an overspray control system	17-11(C)		n	y	y	n	n	y	y	n	n	y	n	Maintenance of the water curtain to minimize the release of overspray		
1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).		40 CFR, Part 60, Subpart MM	n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.		



	40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)	Part 63 Su bp art IIII	n	y	y	n	n	y	m	n	n	n	n	Compliance based on recordkeeping and report requirements.	
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	<u>Comments</u>
		SIP (3745-)	Other												
K011, Final Repair	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 15.8 lbs per hour; and 1.26 lbs of particulate emissions (PE) per hour	31-05(A)(3)		n	n	n	n	n	m	n	n	n	y	The lbs per hour limitations were established reflect the potential to emit for this emissions unit. Maintenance of the water curtain to minimize the release of overspray	
	Emissions from natural gas combustion: 0.04 lb PM10/hr; 0.005 lb SO2/hr; 0.85 lbs NOx/hr; 0.72 lb CO/hr; and 0.05 lb VOC/hr.			n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.	
	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)(1)		n	n	n	n	n	m	n	n	n	y	If required testing based on Method 9.	
	The use of an overspray control system	17-11(C)		n	y	y	n	n	y	y	n	n	y	Maintenance of the water curtain to minimize the release of overspray	
	4.8 pounds VOC per gallon of coating, excluding water and	21-09(n	y	y	n	n	y	n	y	n	n	Compliance based on monitoring records.	



exempt solvents, as a daily, volume-weighted average	C)(1)(d)																		
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EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
K012, Specialty Topcoat Coating and On-Line Repair	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 17.4 lbs per hour; and 0.5 lbs of particulate emissions (PE) per hour.	31-05(A)(3)		n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit. Maintenance of the water curtain to minimize the release of overspray
	Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.14 lb PM10/hr; 0.02 lb SO2/hr; 2.85 lbs NOx/hr; 2.40 lbs CO/hr; and 0.15 lb VOC/hr.			n	n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.
	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.	17-07(A)(1)		n	n	n	n	n	m	n	n	n	y	n	If required testing based on Method 9.
	The use of an overspray control system	17-11(C)		n	y	y	n	n	y	y	n	n	y	n	Maintenance of the water curtain to minimize the release of overspray
	15.1 lbs VOC/gallon of applied solids, as a daily, volume-	21-09(n	y	y	n	n	y	n	y	n	n	n	Compliance based on monitoring records.



	weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).	C)(1)(c)																
	3.0 lbs of VOC/ gallon of coating, minus water and exempt solvent, as applied (when coating miscellaneous metal parts)	21-09(U)		n	y	y	n	n	y	n	y	n	n	n				Compliance based on monitoring records.
	40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks)		Part 63 Subpart IIII	n	y	y	n	n	y	m	n	n	n	n				Compliance based on recordkeeping and report requirements.
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments			
		SIP (3745-)	Other															
K013, Assembly Miscellaneous Coating Line	The monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, shall not exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents	31-05(A)(3)		n	y	y	n	n	y	m	n	n	n	n				Compliance based on monitoring records. (this limitation is less stringent than the limitation specified by OAC rule 3745-21-09(U)(1)(i),
	The VOC emissions shall not exceed 19.6 pounds per hour nor 29.2 tons per rolling, 12-month summation, for all the coatings employed.			n	y	y	n	n	y	m	n	n	y	n				Compliance based on recordkeeping and report requirements.
	The organic compound (OC) emissions, from the use of liquid organic material, not involved in coating metal parts, shall not exceed 5.8 pounds per hour nor			n	y	y	n	n	y	m	n	n	y	n				



EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
K015, Plastic Coating Line	The emissions from this emissions unit shall not exceed: (VOC) emissions shall not exceed 3512 lbs VOC/day; and 172 lbs PM/day.	31-05(A)(3)		n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit. Maintenance of the overspray control system to minimize the release of overspray
	Emissions from natural gas combustion in the drying oven: 0.47 lb PM/hr, 2.04 TPY PM, 0.04 lb SO2/hr, 0.16 TPY SO2, 6.12 lbs NOx/hr, 26.8 TPY NOx, 5.14 lbs CO/hr, 22.51 TPY CO, and 0.67 lb TOC/hr, 2.95 TPY TOC.			n	n	n	n	n	n	n	n	n	n	n	Based on the use of natural gas a fuel.
	The emissions from this emissions unit shall not exceed: 188 tons VOC per rolling, 12-month summation of the monthly emissions; and 8.64 tons of PM per rolling 12-month summation of the emissions.	31-05(D)		n	y	y	n	n	y	m	n	n	y	n	Compliance based on recordkeeping and report requirements.
	The use of an overspray control system	17-11(C)		n	y	y	n	n	y	y	n	n	y	n	Maintenance of the water curtain to minimize the release of overspray
Ohio Toxic Rule		114-01		n	n	y	n	n	y	y	n	n	n	n	Monitoring and reporting



															requirements. (State enforceable only)
		40 CFR 63 Subpart PPPP (Surface coating of Plastic Parts and Products)	40 CFR 63 Subpart PPPP	n	n	y	n	n	y	y	n	n	n	n	Compliance based on recordkeeping and report requirements.
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	<u>Comments</u>
		SIP (3745-)	Other												
K024, Spray Melt Sheet Operation	Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour	31-05(A)(3)		n	n	n	n	n	m	n	n	n	y	n	The lbs per hour limitations were established reflect the potential to emit for this emissions unit.
	Employ a thermal incinerator at all times during operation of this emissions unit.			n	y	y	n	n	y	n	y	n	y	n	Compliance based on recordkeeping and report requirements. Maintenance of the overspray control system to minimize the release of overspray
	VOC emissions shall not exceed 28.7 tons as a rolling, 12-month summation.	31-05(D)		n	y	y	n	n	y	n	y	n	n	n	Compliance based on recordkeeping and report requirements.
	The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents	21-09(U)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on recordkeeping and report requirements.



The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s)	17-11(C)		n	y	y	n	n	y	n	y	n	n	n	Compliance based on recordkeeping and report requirements.	Maintenance of the overspray control system to minimize the release of overspray
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EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
P004, Surfacers Sanding	Use of fabric filters to minimize and/or eliminate particulate emissions (PE).	31-05(A)(3)		n	y	y	n	n	y	n	n	n	y	n	Compliance based on recordkeeping.
	Particulate (PE) emissions shall not exceed 0.88 lbs/hr nor 1.33 tons per rolling.			n	n	n	n	n	n	n	n	n	n	n	Compliance based on maximum potential of the emissions unit.
	The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.	31-05(D)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and periodic testing.
EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
P021, Plastic Parts Painting	Emissions of volatile organic compounds shall not exceed 970.8 lbs VOC/day.	31-05(A)		n	n	n	n	n	n	n	n	n	n	n	Compliance based on maximum potential of the emissions unit.



Miscellaneous Solvent Usag		3)																		
	12.85 tons VOC per rolling, 12-month summation of the monthly emissions.	31-05(D)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.					
	40 CFR 63 Subpart PPPP (Surface coating of Plastic Parts and Products)		40 CFR 63 Subpart PPPP	n	n	y	n	n	y	y	n	n	n	n	Compliance based on recordkeeping and report requirements.					

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
P025, Injection Mold Machine #1	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.	31-05(A)(3)		n	n	n	n	n	n	n	n	n	n	n	Compliance based on maximum potential of the emissions unit.
	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined.	31-05(D)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.
	VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.



Ohio Toxic Rule	114-01		n	n	y	n	n	y	y	n	n	n	n	Monitoring and reporting requirements. (State enforceable only)
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EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
P026, Injection Mold Machine #2	The volatile organic compound (VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.	31-05(A)(3)		n	n	n	n	n	n	n	n	n	n	n	Compliance based on maximum potential of the emissions unit.
	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined.	31-05(D)		n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.
	VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.
	Ohio Toxic Rule	114-01		n	n	y	n	n	y	y	n	n	n	n	Monitoring and reporting requirements. (State enforceable only)

EU(s)	Limitation	Basis		N	O	M	S	E	R	S	R	S	E	M	Comments
		SIP (3745-)	Other												
P027,	The volatile organic compound	31-		n	n	n	n	n	n	n	n	n	n	n	Compliance based on maximum



Injection Mold Machine #3	(VOC) emissions shall not exceed 19.5 lbs/hr for emissions units P025, P026 and P027 combined.	05(A)(3)														potential of the emissions unit.
	VOC emissions from the mold agents and the cleaning solvents shall not exceed 4.82 tons per rolling, 12-month summation for emissions units P025, P026 and P027, combined.	31-05(D)			n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.
	VOC emissions from the plastic pellets shall not exceed 3.56 tons per rolling, 12-month summation for emissions units P025 P026 and P027, combined.				n	y	y	n	n	y	n	y	n	y	n	Compliance based on monitoring records and reporting.
	Ohio Toxic Rule	114-01			n	n	y	n	n	y	y	n	n	n	n	Monitoring and reporting requirements. (State enforceable only)

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.



- If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.
- When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
 2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
 3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
- A. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
HONDA OF AMERICA, EAST LIBERTY PLANT**

Facility ID: 0546000117
Permit Number: P0104750
Permit Type: Renewal
Issued: 9/8/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
HONDA OF AMERICA, EAST LIBERTY PLANT

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Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0037077
Permit Number: P0104750
Permit Description: Auto Assembly Plant
Permit Type: Renewal
Issue Date: 9/8/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0088810

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c) The permittee shall submit required reports in the following manner:
 - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.



(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Southwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with,

or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by

law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down. After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions



1. **All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:**
 - a) B.2.f).
2. **The following are facility-wide terms and conditions:**
 - a) The fuels employed at this facility, excluding the vehicle filling operation, shall not exceed the following:
 - (1) 1500 million cubic feet of natural gas, as a rolling, 12-month summation;
 - (2) 1.0 million gallons of No. 2 fuel oil, as a rolling, 12-month summation; and
 - (3) 0.5%, by weight, sulfur content for the No. 2 fuel oil employed.
 - (4) The permittee shall maintain monthly records of the following information for the facility:
 - a. the natural gas usage, in million cubic feet;
 - b. the No. 2 fuel oil usage, in gallons;
 - c. the percent sulfur content, by weight, for the No. 2 fuel oil employed;
 - d. the rolling, 12-month summation of the monthly natural gas usage rates; and
 - e. the rolling, 12-month summation of the monthly No. 2 fuel oil usage rates.
 - (5) For each shipment of oil received for burning, the permittee shall maintain records of the total quantity of oil received the permittee's or oil supplier's analyses for sulfur content and heat content. A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
 - (6) The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.
 - (7) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage limitation of 1500 million cubic feet, the rolling, 12-month No. 2 fuel oil usage limitation of 1.0 million gallons, and/or the No. 2 fuel oil sulfur content limitation of 0.5%, by weight.

These reports shall be due by the date described in this permit.
 - (8) Compliance with the emission limitation(s) in these terms and conditions shall be determined in accordance with the following method(s):
 - a. Sulfur Content Limitation:



- i. 0.5%, by weight sulfur content

Applicable Compliance Method:

The permittee shall demonstrate compliance with the sulfur content limitation above based on the record keeping requirements established in this permit.

- b. Operational Restrictions:

- i. 1500 million cubic feet of natural gas/rolling, 12-month summation
1.0 million gallons of no. 2 fuel oil/rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restrictions above based on the record keeping requirements established in this permit.

- b) Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21. The following emissions units are defined as insignificant emission units at this facility and meet the requirements of either an exemption under OAC rule 3745-31-03 or have a uncontrolled potential of less than 5 tons per year as defined under OAC rule 3745-77-01(U):

- (1) B001- No. 1 Steam Boiler (exempt per OAC rule 3745-31-03);
- (2) B002- No. 2 Steam Boiler (exempt per OAC rule 3745-31-03);
- (3) B003- No. 3 Steam Boiler (exempt per OAC rule 3745-31-03).
- (4) B007 - air handler No. 25 (PTI 05-0022, issued 5/19/99);
- (5) B036 - air handler No. 24 (exempt per OAC rule 3745-31-03);
- (6) B037 - air handler No. 26 (exempt per OAC rule 3745-31-03);
- (7) B038 - air handler No. 27 (exempt per OAC rule 3745-31-03);
- (8) B043 - fire pump No. 1 (exempt per OAC rule 3745-31-03);
- (9) B044 - fire pump No. 2 (exempt per OAC rule 3745-31-03);
- (10) B045 - emergency generator No. 1 (exempt per OAC rule 3745-31-03);
- (11) G001 - AF gasoline/diesel dispensing (exempt per OAC rule 3745-31-03);
- (12) G002 - AQ gasoline dispensing (exempt per OAC rule 3745-31-03); K018 - WE rust prevention (PTI 05-7914, issued on 7/24/96);



- (13) G003 - ELP gas plaza (exempt per OAC rule 3745-31-03).
- (14) L022 - cold cleaner - MPW cage ST cold cleaner (exempt per OAC rule 3745-31-03);
- (15) L003 - MOS cold cleaner (exempt per OAC rule 3745-31-03);
- (16) L004 - PA cold cleaner - clearcoat B booth/interior check (exempt per OAC rule 3745-31-03);
- (17) L005 - PA cold cleaner - basecoat B booth/operating area (exempt per OAC rule 3745-31-03);
- (18) L006 - PA cold cleaner - basecoat A booth/operating area (exempt per OAC rule 3745-31-03);
- (19) L007 - PA cold cleaner - clearcoat A booth/interior check (exempt per OAC rule 3745-31-03);
- (20) L008 - PA cold cleaner - primer booth/interior check (exempt per OAC rule 3745-31-03);
- (21) L009 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);
- (22) L010 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);
- (23) L011 - PA cold cleaner - maintenance cage (exempt per OAC rule 3745-31-03);
- (24) L012 - PA cold cleaner - maintenance oil storage (exempt per OAC rule 3745-31-03);
- (25) L013 - PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03);
- (26) L014- PA cold cleaner - MPW conveyor cleaning (exempt per OAC rule 3745-31-03);
- (27) L015 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03);
- (28) L016 - PA cold cleaner - paint mix (exempt per OAC rule 3745-31-03);
- (29) L017 - cold cleaner - AF maintenance cage (exempt per OAC rule 3745-31-03);
- (30) L018 - cold cleaner 1 - maintenance cage (exempt per OAC rule 3745-31-03);
- (31) L019 - cold cleaner 2 - maintenance cage (exempt per OAC rule 3745-31-03);
- (32) L020 - cold cleaner 3 - maintenance cage (exempt per OAC rule 3745-31-03);
- (33) L021 - cold cleaner - paint OTP maintenance cage (exempt per OAC rule 3745-31-03);
- (34) P001 - pretreatment/phosphate process (PTI 05-7923, modification issued 1/08/08);
- (35) P002 - body line paint effluent system (PTI 05-7923, modification issued 1/08/08);
- (36) P003 - EDP sanding (PTI 05-7923, modification issued 1/08/08) ;
- (37) P004 - surfacer sanding (PTI 05-7923, modification issued 1/08/08);



- (38) P006 - process welding and related operations (PTI 05-7923, modification issued 1/08/08);
- (39) P014 - on-line repair sanding (PTI 05-7923, modification issued 1/08/08);
- (40) P015 - final inspection dynamometer (exempt per OAC rule 3745-31-03(A)(1)(rr) PTI 05-10359, issued 4/26/00);
- (41) P016 - topcoat inspection sanding (PTI 05-7923, modification issued 1/08/08);
- (42) P017 - inspection sanding (PTI 05-7923, modification issued 1/08/08);
- (43) P018 - WE sealer wipe (PTI 05-06431, issued 8/28/01);
- (44) P020 - BPA polish (PTI 05-10278, modification issued on 10/04/07);
- (45) P023 - stamping transfer press (PTI 05-9074, issued 6/3/99);
- (46) P035 - MS parts washer (exempt per OAC rule 3745-31-03);
- (47) P044 - Wheelabrator (exempt per OAC rule 3745-31-03);
- (48) T001 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);
- (49) T002 - volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);
- (50) T005 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);
- (51) T006 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);
- (52) T007 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);
- (53) T008 - non-volatile material storage tank and dispensing (PTI 05-7923, modification issued 1/08/08);
- (54) T009 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);
- (55) T010 - virgin solvent storage tank (exempt per OAC rule 3745-31-03);
- (56) T011 - virgin solvent storage tank (exempt per OAC rule 3745-31-03);
- (57) T012 - BPA spent solvent storage tank and loading rack (exempt per OAC rule 3745-31-03);
- (58) T013 - non-volatile material storage tank and dispensing (exempt per OAC rule 3745-31-03);
- (59) T019 - Bonderite storage tank (exempt per OAC rule 3745-31-03);

- (60) T020 - muriatic acid storage tank (exempt per OAC rule 3745-31-03); and
- (61) T024 - PA spent solvent storage tank and loading rack (exempt per OAC rule 3745-31-03).
- c) For the purposes of this permit, references to particulate emissions (PE) refers to the definition in OAC rule 3745-17-01(B)(11). Per OAC rule 3745-17-11, PE is defined as, "particulate matter measurable by the applicable test methods in 'Appendix A' of 40 CFR Part 60 'Standards of Performance for New Stationary Sources,' as such appendix existed on July 1, 1996."
- d) The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart PPPP-- Plastic Parts Surface Coating (see attached):
- (1) K015; and P020
- e) The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart IIII-- Automobile and Light-Duty Truck Surface Coating:
- (1) K001; K002; K003; K005; K006; K007; K008; K009; K011; K012; K013; and K024.
- f) The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
- (1) K025 - BPA paint mini-spray booth;
- (2) K026 - PA New Model Development, On-line Repair and Testing Painting Activities.
- (3) P030 - wastewater treatment plant;
- (4) P031 - water plant lime silo;
- (5) P032 - paint test lab;
- (6) P039 - reject repair area;
- (7) P040 - silo 1;
- (8) P041 - silo 2;
- (9) P042 - silo 3;
- (10) P043 - silo 4;
- (11) T003 - non-volatile material storage tank and dispensing;
- (12) T004 - non-volatile material storage tank and dispensing;
- (13) T014 - non-volatile material storage tank and dispensing;
- (14) T022 - refrigerant pressurized storage tank distn. system; and
- (15) K027 (old Z128) - anti-spatter blue coat.

C. Emissions Unit Terms and Conditions



1. B004, Hot Water Boiler No. 1

Operations, Property and/or Equipment Description:

Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists four rows (a-d) detailing OAC rules and their corresponding emission limits for particulate emissions, nitrogen oxides, carbon monoxide, and SO2.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.

- (2) The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.
 - (3) The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:
 - a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
 - b. sulfur content of 0.5%.
- d) Monitoring and/or Recordkeeping Requirements
- (1) For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (2) The permittee shall maintain monthly records of the following information for this emissions units:
 - a. the amount of No. 2 fuel oil consumed, in gallons;
 - b. the amount of natural gas consumed, in million cubic feet;
 - c. the PE rate, in tons, calculated as follows:
 - i. for natural gas consumption, multiply by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98);
 - iii. sum "i" + "ii", and then divide by 2000; and
 - iv. the total amount of PE tons the previous 12 month period.
 - d. the NO_x emission rate, in tons, calculated as follows:
 - i. for natural gas consumption, multiply by the emission factor of 100 lbs NO_x/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 20 lbs NO_x/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
 - iii. sum "i" + "ii", and then divide by 2000. and
 - iv. the total amount of NO_x tons the previous 12 month period.
 - e. the CO emission rate, in tons, calculated as follows:

- i. for natural gas consumption, multiply by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
 - iii. sum "i" + "ii", and then divide by 2000 and
 - iv. the total amount of NOx tons the previous 12 month period.
 - f. The total amount of back-up number 2 fuel oil employed during the previous 12 month period.
 - (3) The permittee shall maintain monthly records of the following information on the number 2 fuel oil employed in emissions units B001 thru B006:
 - a. the amount of No. 2 fuel oil consumed, in gallons; and
 - b. The total amount of back-up number 2 fuel oil employed during the previous 12 month period.
 - (4) Based on the oil analyses required in sections c) of this permit, the permittee shall maintain records on:
 - a. the calculated sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).); and
 - b. the sulfur content in percent.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances where the PE emissions exceeded 0.60 tons per year, on a rolling monthly average;
 - b. all instances where the NOx emissions exceeded 5.54 tons per year, on a rolling monthly average;
 - c. all instances where the PE emissions exceeded 4.64 tons per year, on a rolling monthly average;
 - d. all instances the total amount of back-up number 2 fuel oil employed in emissions units B001 thru B006 exceeded 1,000,000 gallons during the previous 12 month period;
 - e. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed;



- f. all instances in which number 2 fuel oil with greater than 1.6 lbs of SO₂/mmBTU of actual heat input is employed.
- g. all instances in which fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

- a. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

- b. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:

1.6 lb SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in d)(4) of this permit.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

d. Emission Limitation:

0.60 TPY of PE

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month PE rates.

e. Emission Limitation:

5.54 TPY of NO_x

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month NO_x emission rates.

f. Emission Limitation:

4.65 TPY of CO

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month CO emission rates.

g. Emission Limitation:

0.5 % sulfur content in number 2 fuel oil employed.

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in d)(4) of this permit.

h. Visible Emission Limitations:

20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.



Applicable Compliance Method(s):

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A,.

g) .Miscellaneous Requirements

- (1) None.



2. B005, Hot Water Boiler No. 2

Operations, Property and/or Equipment Description:

Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

- 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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists four rows (a-d) detailing OAC rules and their corresponding emission limits for particulate emissions, nitrogen oxides, carbon monoxide, and SO2.

- (2) Additional Terms and Conditions
a. None.
c) Operational Restrictions
(1) The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.

- (2) The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.
 - (3) The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:
 - a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
 - b. sulfur content of 0.5%.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (2) The permittee shall maintain monthly records of the following information for this emissions units:
 - a. the amount of No. 2 fuel oil consumed, in gallons;
 - b. the amount of natural gas consumed, in million cubic feet;
 - c. the PE rate, in tons, calculated as follows:
 - i. for natural gas consumption, multiply by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98);
 - iii. sum "i" + "ii", and then divide by 2000; and
 - iv. the total amount of PE tons the previous 12 month period.
 - d. the NOx emission rate, in tons, calculated as follows:
 - i. for natural gas consumption, multiply by the emission factor of 100 lbs NOx/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 20 lbs NOx/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
 - iii. sum "i" + "ii", and then divide by 2000. and
 - iv. the total amount of NOx tons the previous 12 month period.
 - e. the CO emission rate, in tons, calculated as follows:

- i. for natural gas consumption, multiply by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
 - iii. sum "i" + "ii", and then divide by 2000 and
 - iv. the total amount of NOx tons the previous 12 month period.
 - f. The total amount of back-up number 2 fuel oil employed during the previous 12 month period.
 - (3) The permittee shall maintain monthly records of the following information on the number 2 fuel oil employed in emissions units B001 thru B006:
 - a. the amount of No. 2 fuel oil consumed, in gallons; and
 - b. The total amount of back-up number 2 fuel oil employed during the previous 12 month period.
 - (4) Based on the oil analyses required in sections c) of this permit, the permittee shall maintain records on:
 - a. the calculated sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).); and
 - b. the sulfur content in percent.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances where the PE emissions exceeded 0.60 tons per year, on a rolling monthly average;
 - b. all instances where the NOx emissions exceeded 5.54 tons per year, on a rolling monthly average;
 - c. all instances where the PE emissions exceeded 4.64 tons per year, on a rolling monthly average;
 - d. all instances the total amount of back-up number 2 fuel oil employed in emissions units B001 thru B006 exceeded 1,000,000 gallons during the previous 12 month period;
 - e. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed;



- f. all instances in which number 2 fuel oil with greater than 1.6 lbs of SO₂/mmBTU of actual heat input is employed.
- g. all instances in which fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

- a. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

- b. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:

1.6 lb SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in d)(4) of this permit.



When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

d. Emission Limitation:

0.60 TPY of PE

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month PE rates.

e. Emission Limitation:

5.54 TPY of NO_x

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month NO_x emission rates.

f. Emission Limitation:

4.65 TPY of CO

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month CO emission rates.

g. Emission Limitation:

0.5 % sulfur content in number 2 fuel oil employed.

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in d)(4) of this permit.

h. Visible Emission Limitations:

20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.



Applicable Compliance Method(s):

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



3. B006, Hot Water Boiler No. 3

Operations, Property and/or Equipment Description:

Natural gas/No. 2 oil-fired 16.875 MMBTU/hr hot water boiler

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.

Table with 3 columns: Row Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists four rows (a-d) detailing OAC rules and their corresponding emission limits for particulate emissions, nitrogen oxides, carbon monoxide, and SO2.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 oil fuel oil in this emissions unit.

- (2) The combined number 2 fuel oil usage in emissions units B001, B002, B003, B004, B005, and B006 shall not exceed one million gallons, as based on a rolling 12-month period.
 - (3) The quality of the oil burned in this emissions unit shall meet the following specifications on an monthly basis:
 - a. sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
 - b. sulfur content of 0.5%.
- d) Monitoring and/or Recordkeeping Requirements
- (1) For each day during which the permittee burns a fuel other than natural gas and/or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (2) The permittee shall maintain monthly records of the following information for this emissions units:
 - a. the amount of No. 2 fuel oil consumed, in gallons;
 - b. the amount of natural gas consumed, in million cubic feet;
 - c. the PE rate, in tons, calculated as follows:
 - i. for natural gas consumption, multiply by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Table 1.4-2, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 2 lbs PE/1000 gallons (from AP-42, Table 1.3-1, revised 9/98);
 - iii. sum "i" + "ii", and then divide by 2000; and
 - iv. the total amount of PE tons the previous 12 month period.
 - d. the NO_x emission rate, in tons, calculated as follows:
 - i. for natural gas consumption, multiply by the emission factor of 100 lbs NO_x/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 20 lbs NO_x/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
 - iii. sum "i" + "ii", and then divide by 2000. and
 - iv. the total amount of NO_x tons the previous 12 month period.
 - e. the CO emission rate, in tons, calculated as follows:



- i. for natural gas consumption, multiply by the emission factor of 84 lbs CO/mm cu. ft. (from AP-42, Table 1.4-1, revised 7/98);
 - ii. for No. 2 fuel oil consumption, multiply by the emission factor of 5 lbs CO/1000 gallons (from AP-42, Table 1.3-1, revised 9/98); and
 - iii. sum "i" + "ii", and then divide by 2000 and
 - iv. the total amount of NOx tons the previous 12 month period.
 - f. The total amount of back-up number 2 fuel oil employed during the previous 12 month period.
 - (3) The permittee shall maintain monthly records of the following information on the number 2 fuel oil employed in emissions units B001 thru B006:
 - a. the amount of No. 2 fuel oil consumed, in gallons; and
 - b. The total amount of back-up number 2 fuel oil employed during the previous 12 month period.
 - (4) Based on the oil analyses required in sections c) of this permit, the permittee shall maintain records on:
 - a. the calculated sulfur dioxide emission rate (in lbs/mmBtu) for this emissions unit. (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).); and
 - b. the sulfur content in percent.
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances where the PE emissions exceeded 0.60 tons per year, on a rolling monthly average;
 - b. all instances where the NOx emissions exceeded 5.54 tons per year, on a rolling monthly average;
 - c. all instances where the PE emissions exceeded 4.64 tons per year, on a rolling monthly average;
 - d. all instances the total amount of back-up number 2 fuel oil employed in emissions units B001 thru B006 exceeded 1,000,000 gallons during the previous 12 month period;
 - e. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed;



- f. all instances in which number 2 fuel oil with greater than 1.6 lbs of SO₂/mmBTU of actual heat input is employed.
- g. all instances in which fuel other than natural gas and/or number two fuel oil was burned in this emissions unit.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

- a. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

When burning natural gas, compliance may be determined by multiplying the maximum hourly natural gas usage rate (16,875 cu.ft/hr) by the emission factor of 1.9 lbs PE/mm cu. ft. (from AP-42, Volume I, Fifth Edition, Table 1.4-2, revised 7/98), and then dividing by the heat input capacity (mmBtu/hr).When firing No.2 oil, compliance may be determined by multiplying the maximum hourly No. 2 fuel oil usage rate (125 gallon/hr) by the emission factor of 2.0 lbs PE/1000 gallon (from AP-42, Volume I, Fifth Edition, Table 1.3-1, revised 9/98), and then dividing by the heat input capacity (mmBtu/hr).If required, compliance with the limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(9).

- b. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:

1.6 lb SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in d)(4) of this permit.

When firing natural gas, compliance with this emission limitation shall be assumed due to the negligible sulfur content, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation above in accordance with the methods specified in 40 CFR Part 60, Appendix A, Method 6C.

d. Emission Limitation:

0.60 TPY of PE

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month PE rates.

e. Emission Limitation:

5.54 TPY of NO_x

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month NO_x emission rates.

f. Emission Limitation:

4.65 TPY of CO

Applicable Compliance Method:

The permittee shall demonstrate compliance based on the record keeping requirements established in d)(2) of this permit and shall be the summation of the 12 calendar month CO emission rates.

g. Emission Limitation:

0.5 % sulfur content in number 2 fuel oil employed.

Applicable Compliance Method:

When firing No.2 oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the record keeping requirements in d)(4) of this permit.

h. Visible Emission Limitations:

20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.



Applicable Compliance Method(s):

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

g) .Miscellaneous Requirements

- (1) None.



4. B035, Generator #2

Operations, Property and/or Equipment Description:

1135 hp, Emergency generator

- 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.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-13448) with emission limits for NOx, CO, VOC, PE, and SO2. Row b: OAC rule 3745-31-05(D) with emission limits for NOx, CO, VOC, PE, and SO2.



Table with 3 columns: Applicability, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-07(A)(1) for visible particulate emissions and OAC rule 3745-17-11(B)(5)(b) for PE.

(2) Additional Terms and Conditions

- a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.
b. OAC rule 3745-18-06(B) exempts fuel burning equipment which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity from the requirements are exempt from paragraphs (D), (F) and (G) of this rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation.
(2) The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for this emissions unit:
a. the total hours of operation for this emissions unit for each month; and
b. the rolling, 12-month summation of operating hours.
(2) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or



oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/MMBtu). The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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

- (3) For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all instances the total rolling, 12-month hours of operation exceeds 500;
 - b. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed; and
 - c. all instances in which fuel other than diesel (number two fuel oil) was burned in this emissions unit.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
 - i. NO_x - 24.0 lbs/hr and 6.0 tons/rolling, 12-month summation
 - ii. CO - 6.4 lbs/hr and 1.59 tons/rolling, 12-month summation
 - iii. VOC - 0.6 lb/hr and 0.15 tons/rolling, 12-month summation
 - iv. PE - 2.7 lbs/hr and 0.68 tons/rolling, 12-month summation
 - v. SO₂ - 3.8 lbs/hr and 0.95 tons/rolling, 12-month summation



Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 7.49 MMBTU/hr by the emission factor* for each pollutant, from AP-42, Table 3.4-1.

* for NOx, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO2, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU. 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 A.

** 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 PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6. The rolling, 12-month emission limitations were established by multiplying the maximum hourly emission limitations by 500 hours per rolling, 12-months, and then dividing the results by 2000 lbs/ton.

If compliance is demonstrated with the 500 hours per rolling, 12-month summation limitation, then compliance is ensured with the rolling, 12-month emissions limitations.

b. Visible Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

c. Emission Limitation:

0.062 lb PE/mmBtu

Applicable Compliance Limit:

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.

g) Miscellaneous Requirements

(1) None.



5. B409, Generator #3

Operations, Property and/or Equipment Description:

1232 HP generator, was moved from MMP to ELP on July of 2003

- 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-13448) with emissions limits for NOx, CO, VOC, PE, and SO2. Row b: OAC rule 3745-31-05(D) with emissions limits for NOx, CO, VOC, PE, and SO2.



Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(5)(b), and OAC rule 3745-18-06.

(2) Additional Terms and Conditions

- a. The hourly potential emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limits.
b. OAC rule 3745-18-06(B) exempts fuel burning equipment which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity from the requirements are exempt from paragraphs (D), (F) and (G) of this rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 500 hours as a rolling, 12-month summation.
(2) The permittee shall burn only diesel fuel (no. 2 fuel oil) in this emissions unit that has a sulfur content of 0.5% or less. Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of oil received.

d) .Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for this emissions unit:
a. the total hours of operation for this emissions unit for each month; and
b. the rolling, 12-month summation of operating hours.
(2) For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or

oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/MMBtu). The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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

- (3) For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all instances the total rolling, 12-month hours of operation exceeds 500;
 - b. all instances in which number 2 fuel oil with greater than 0.5% sulfur content is employed; and
 - c. all instances in which fuel other than diesel (number two fuel oil) was burned in this emissions unit.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1). of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitations:
 - i. NO_x - 28.5 lbs/hr and 7.1 tons/rolling, 12-month summation;
 - ii. CO - 7.64 lbs/hr and 1.9 tons/rolling, 12-month summation;
 - iii. VOC - 0.7 lb/hr and 0.18 tons/rolling, 12-month summation;
 - iv. PE - 3.2 lbs/hr and 0.8 tons/rolling, 12-month summation; and
 - v. SO₂ - 4.5 lbs/hr and 1.13 tons/rolling, 12-month summation



Applicable Compliance Method:

The hourly allowable emission limitations mentioned-above were established by multiplying the maximum hourly heat input rating for the diesel generator of 8.91 MMBTU/hr by the emission factor* for each pollutant, from AP-42, Table 3.4-1.

* for NOx, 3.2 lb/MMBTU; for CO, 0.85 lb/MMBTU; for PE, 0.35 lb/MMBTU; for VOC, 0.0819 lb/MMBTU; and for SO2, 1.01 x % sulfur content, by weight (0.5%) lb/MMBTU.

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 PE, Methods 1 - 5; and for SO2, Methods 1 - 4 and 6. The rolling, 12-month emission limitations were established by multiplying the maximum hourly emission limitations by 500 hours per rolling, 12-months, and then dividing the results by 2000 lbs/ton.

If compliance is demonstrated with the 500 hours per rolling, 12-month summation limitation, then compliance is ensured with the rolling, 12-month emissions limitations.

b. Visible Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

c. Emission Limitation:

0.062 lb PE/mmBtu

Applicable Compliance Limit:

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.

g) Miscellaneous Requirements

(1) None.



6. F096, Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas at East Liberty (ELP) and MEI

- 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.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-8339) with detailed particulate emission and visibility control measures. Row b: OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B) with reference to Section b)(2)k.

- (2) Additional Terms and Conditions
- a. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
- i. ID 1 - Truck entrance;
 - ii. ID 2 - South truck dock area;
 - iii. ID 3 - Container storage yard;
 - iv. ID 4 - Associate entrance drive;
 - v. ID 5 - Associate parking;
 - vi. ID 6 - Test track;
 - vii. ID 7 - Brake test area;
 - viii. ID 8 - North truck dock area;
 - ix. ID 9 - Access road to east side;
 - x. ID 10 - Access road to north side;
 - xi. ID 11 - AQG building FTZ parking;
 - xii. ID 12 - AQG associate parking lot;
 - xiii. ID 13 - Gas plaza;
 - xiv. ID 14 - AH car storage;
 - xv. ID 15 - AH entry drive;
 - xvi. ID 16 - AH truck staging; and
 - xvii. ID 17 - AH railcar staging.
- b. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:
- i. ID U1 - Rapp-Dean Road (behind ELP); and
 - ii. ID U2 - Access to sub-station.
- c. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall employ vacuum assisted sweeping for the paved roadways and parking areas at sufficient frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved shoulders as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee will improve the surface of any unpaved roadway and parking area as necessary to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. The permittee shall require operators of open-bodied vehicles transporting materials likely to become airborne to keep such materials covered if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- k. This emissions unit is not located in an "Appendix A" area as indicated in OAC rule 3745-17-08. Therefore, the emissions unit is not subject to the RACM requirements established in OAC rule 3745-17-08(B) and the visible emission limitations specified in OAC rule 3745-17-07(B).



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise specified in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:
 - a. for all paved roadways and parking areas, as identified in b)(2)a., the minimum inspection frequency shall be weekly; and
 - b. for all unpaved roadways and parking areas, as identified in b)(2)b., the minimum inspection frequency shall be weekly.

After the permittee has performed weekly inspections of the paved and the unpaved roadways and parking areas for one calendar quarter and no visible particulate emissions of fugitive dust have been observed, the permittee may begin inspections of the paved and the unpaved roadways and parking areas once per month. If visible particulate emissions of fugitive dust are observed during subsequent monthly inspections, the permittee shall return to an inspection frequency of once per week until no visible particulate emissions of fugitive dust are observed for another calendar quarter. All inspections shall be performed during representative, normal traffic conditions.

- (2) The purpose of the inspections is to determine the need for implementing the additional control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures. The information required in (3)d. shall be kept separately for:
 - i. the paved roadways and parking areas; and

- ii. the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- (4) Reconfiguration of the roadways and parkways areas and variations in traffic patterns at this facility may not be a modification under OAC rule 3745-31-01 as long as emissions are equal to or less than the established PTI limitations. If the change is determined to be a modification then the permittee must apply for and obtain a permit to install prior to the installation of the change.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
- a. each instance when an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following method:
- a. Emission Limitation:

There shall be no visible PE from any paved roadway or parking area, except for a period of time not to exceed 1 minute during any 60-minute observation period.

There shall be no visible PE from any unpaved roadway or parking area, except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

Compliance shall be determined based on the records under Section d)(1) of this permit.

If required, compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix



existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation:

PE shall not exceed 23.22 tons per year.

PM10 shall not exceed 5.25 tons per year.

The allowable limitations were based on the following equations:

Paved Roads:

$$E = k(sL/2)^{0.65} (W/3)^{1.5} (1-P/4N)^*$$

Where:

E = particulate emission factor (pounds/VMT);

k = constant - 0.082 for PE and 0.016 for PM10 (particle size multiplier for pounds/VMT);

sL = road surface silt loading (g/m²);

W = mean vehicle weight in tons;

P = number of days with at least 0.01 inches of precipitation per year (120 days for central Ohio, Figure 13.2.1-2, AP-42, section 13.2.1); and

N = number of days in the averaging period = 365 days/year.

Unpaved Roadways:

$$E = k(s/12)^a (W/3)^b [(365 - p)/365]^*$$

Where;

E = size-specific particulate emission factor (lb/VMT);

k = constant - 4.9 for PE and 1.5 for PM10 (particle size multiplier for pounds/VMT);

s = surface material silt content;

W = mean vehicle weight in tons;

a = constant - 0.7 for PE and 0.9 for PM10;

b = constant - 0.45 for both PE and PM10; and

p = number of days with at least 0.01 inches of precipitation per year (120 days for central Ohio, Figure 13.2.2-1, AP-42, section 13.2.2).



Applicable Compliance Method:

Compliance shall be based on the recordkeeping and reporting requirements under Sections d) and e) of this permit.

g) Miscellaneous Requirements

(1) None.



7. 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rule 3745-21-09(C)(1)(a), and OAC rule 3745-18-06(E).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B) (for the direct-fired ovens associated with this emissions unit)	See Section b)(2)g, below.
f.	OAC rule 3745-17-07(A) (for direct-fired ovens associated with this emissions unit)	See Section b)(2)h, below.
g.	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).
h.	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.
i.	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).
j.	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)(9), e)(6) 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 $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average; and
 - (b) Total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ 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. 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.
 - f. 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)(2) below.
 - g. The emission limitations for PM10, SO₂, NO_x, 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.

- h. 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 the thermal incinerator when the e-coat oven is processing units (vehicles). The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations and 40 CFR Part 60, Subpart MM, with any modifications deemed necessary by the permittee.
- (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) 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) 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
 - c. 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).
- (4) 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).
- (5) If a credit for recovered materials is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials and the recovery tank serving the emissions units subject to the applicable VOC emission limitation (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.

- (6) 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.
 - (7) 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.
 - (8) 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).
 - (9) 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 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 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)(1), 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 Automobile 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 $0.7 \times 350^{(0.160 - R_T)}$ lb/gas, as a monthly volume-weighted average and the total VOC emissions (free solvent + cure volatiles) shall not exceed $1.0 \times 350^{(0.160 - R_T)}$ 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)(4), 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)(3), 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. 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 permittee shall conduct or have conducted an incinerator destruction efficiency test within 12 months prior to the applicable Title V permit expiration."

b. 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). An initial capture efficiency test shall be conducted within 12 months of the final issuance of this permit.

c. 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, Southwest District Office. The Ohio EPA, Southwest District Office will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

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

Personnel from the Ohio EPA, Southwest 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, Southwest 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, Southwest District Office.

(3) Emission Limitation:

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

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.
 - (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.
- g) Miscellaneous Requirements
- (1) None.



8. K002, Sealer/Deadener Coating Line

Operations, Property and/or Equipment Description:

Robotic and manual sealer and deadener application equipment, natural gas-fired air supply houses, bake oven and thermal oxidizer

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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing specific rules and emission limits for VOC, SO2, and CO.



Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rules 3745-17-11(B), 3745-17-07(A), 3745-17-10(B), 3745-17-11(C), and 40 CFR Part 63, Subpart IIIII.

(2) Additional Terms and Conditions

- a. 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.
b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
d. The 14.1 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to

establish record keeping and reporting requirements to ensure compliance with this limit.

- e. The hourly natural gas emission limitations are based on potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- f. 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)(17).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) 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.
- (3) The permittee shall burn only natural gas in this emissions unit.
- (4) The volatile organic compound (VOC) content shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.
- (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.
- (6) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature 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 emissions unit was in operation, 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.
- (2) 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.
- (3) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents;
- c. the amount of each coating employed, in gallons per month, excluding water and exempt solvents;
- d. the VOC generated from each coating, in tons per month (the summation of ["b" x "c"]/ 2000 lbs/ton);
- e. the total VOC generated by all coating employed in this emissions unit, in tons per month (the summation of all "d" for all coating employed in this emissions unit);

- f. the total controlled VOC emissions, for all the coatings employed, in tons per month (the summation of $\{[("e" \times \text{the capture efficiency}) \times (1 - \text{the control efficiency})] + ["e" \times (1 - \text{the capture efficiency})]\}$;g. the rolling, 12-month total combined VOC emitted from this emissions units, in tons (the total individual VOC emitted, in tons, for the current month ("f") plus the total amount of VOC emissions for the 11 previous calendar months).
- (4) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3131.
- (5) 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;
- e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
- f. 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).
- (6) 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
- c. 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).
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These

documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

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



- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1), above.;
- b. all instances when a fuel other than natural gas was burned in this emissions unit;
- c. all instances when the total product exceeds exceed 31,000 units per month;
- d. all instances when the total product exceeds 267,000 units per rolling, 12-month;
- e. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;
- f. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or
- g. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall notify Ohio EPA, Southwest District Office, in writing, of any monthly record showing an exceedance of the VOC content limit of 3.0 pounds per gallon of coating, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Southwest District Office within thirty (30) days after the exceedance occurs.
 - (3) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile 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. Emissions Limitation:
3.0 lbs VOC/gallon of coating, excluding water and exempt solvent, as applied.
Applicable Compliance Method:



Compliance shall be based on the recordkeeping on the VOC content of the coatings employed in Section d)(3), of this permit.

b. Emission Limitation:

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.

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 Section d)(5), of this permit.

d. Emission Limitations:

0.06 lb PE (filterable)/hr;

0.02 lb SO₂/hr;

3.3 lbs NO_x/hr;

2.8 lbs CO/hr; and

0.2 lb VOC/hr.

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (32,353 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 NO_x: 100 lbs NO_x/mm cu. ft.; for CO, 84 lbs CO/mm cu. ft.; for PM₁₀, 1.9 lbs PE/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 PE is assumed to be PM10

e. Emission limitation:

14.1 lbs VOC/hr

The hourly emission limitation is based on the following equation:

$$E_h = (VOC_u \times Be) + \{[VOC_u \times (1 - Be)] \times (1 - De)\}$$

Where:

HER = maximum Hour Emission Rate, in lbs of VOC per hour;

VOC_u = the maximum VOC usage of 60.01 pounds (this is based upon maximum usage and maximum VOC content for both the sealer materials and deadner materials);

Be = the maximum uncaptured emissions from the booth based upon engineering estimates of 15% or 0.15¹; and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

Applicable Compliance Method:

Compliance is based on the assumption that the above data represents the maximum production rate, minimal capture efficiency, and minimal destruction efficiency of these emissions unit, its ventilation system, and control device. Any changes in these assumptions may trigger additional air pollution permit review.

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

¹ Based upon the analytical test results of the deadner and sealer materials employed in this emissions unit, it has been concluded that the evaporation losses of solvents prior to and after the oven is negligible. Therefore, it is reasonable to assume that the average capture efficiency is much higher than the 85%, by weight, used for the calculations of VOC emissions. Hence, capture efficiency testing is not required for this emissions unit.

f. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart IIII 63.3091 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart IIII, the permittee shall demonstrate compliance using the applicable methods detailed in 63.3150 through 63.3152 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.3081 and 63.3082 of 40 CFR Part 63, Subpart IIII.

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

- a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator.
- c. The emission testing shall be conducted to demonstrate compliance with the 14.1 lbs VOC/hr emission limitation.
- d. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.



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

- e. The test(s) shall be conducted while the emissions unit is operating at or near its normal operational levels, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office.

- (3) Formulation data or USEPA Method 24 shall be used to determine the 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.

g) Miscellaneous Requirements

- (1) None.



9. K003, Guidecoat Line

Operations, Property and/or Equipment Description:

Primer/Surfacer coating booths with manual and robotic application equipment, and natural gas-fired air supply houses, bake ovens and thermal oxidizer

- 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-07923) with various emission limits like 1.06 kg of VOC/liter, 149.9 lbs VOC per hour, etc. Row b: OAC rule 3745-17-07(A)(1) with visible PE limit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(C) (from overspray associated with this emissions unit)	The use of an overspray control system. See Sections b)(2)h. and i., c)(5) and (6), d)(6) thru (10), and e)(1), below.
d.	40 CFR, Part 60, Subpart MM	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-09(C)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-18-06(E)	The SO ₂ emission limitation specified by this rule is less stringent than the SO ₂ emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
g.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	b)(2)f, below.
h.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	b)(2)g, below.
i.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
j.	OAC rule 3745-17-07(A) (for the indirect-fired oven zones 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.
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.

- (2) Additional Terms and Conditions
- a. 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.
 - b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
 - c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
 - d. The 149.9 lbs VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
 - e. The emission limitations for PM10, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven, the air supply houses, 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.
 - f. 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).
 - g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
 - h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]
 - i. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)] [OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) 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.
- (3) The permittee shall burn only natural gas in this emissions unit.
- (4) The permittee shall operate a downdraft/scrubber control system whenever this emissions unit is in operation.
- (5) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)] [OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

- (7) 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 operate and maintain a continuous temperature monitor and recorder that which 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.
- (2) 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
- c. 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).
- (3) 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;
- e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
- f. 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).
- (4) The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
- a. the name and identification number of each coating;
- b. the amount of each coating employed, in gallons per month;
- c. the VOC content of each coating employed, in pounds of VOC per gallon;

- d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
- i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

- (5) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
 - a. the number of units processed; and
 - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]
- (7) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]
- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (9) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

- (11) 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.
- (12) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;
 - 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)(1), above.;
 - all instances when a fuel other than natural gas was burned in this emissions unit;
 - all instances when the total product exceeds exceed 31,000 units per month;
 - all instances when the total product exceeds 267,000 units per rolling, 12-month;

- f. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or
- g. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- h. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

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

a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(4).

b. Emission Limitation:

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 d)(2), of this permit.

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)(3), of this permit.

d. Emission Limitations:

5.4 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping in Sections d)(6) thru (10), of this permit, and the maintenance and upkeep of the water wash control system.

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.

e. Emission Limitations:

0.20 lb PM10/hr;

0.02 lb SO2/hr;

4.05 lbs NOx/hr;



3.40 lbs CO/hr; and

0.21 lb VOC/hr

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,450 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 A.

** 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

Applicable Compliance Method:

Compliance will be assured based on the recordkeeping in Section d)(11), of this permit.

f. Emission limitation:

149.9 lbs VOC per hour

The above allowable is established based on the following equation:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

Where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents;

Ce = capture efficiency (as determined during the most recent compliance demonstration); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance demonstration).

Applicable Compliance Method:

Compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.

g. Emission Limitation:

Visible PE from overspray associated with this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

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) and 40 CFR Part 60, Appendix A, Method 9.

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

- a. Within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA.
- b. Demonstrate the actual capture efficiency of the overall VOC emissions being emitted from the emissions unit;
- c. Demonstrate compliance with the allowable hourly emission limitation of 149.9 lbs of VOC;
- d. Destruction efficiency testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- e. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 thru 4, of 40 CFR, Part 60, Appendix A (for sample and velocity traverses); and
 - ii. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods

and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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

The test(s) shall be conducted while the emissions unit is operating at or near its normal operating conditions and throughput, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office.

- (3) Formulation data or USEPA Method 24 shall be used to determine the 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.

g) **Miscellaneous Requirements**

- (1) None.



10. K005, Topcoat Coating Line A

Operations, Property and/or Equipment Description:

Topcoat coating line A with robotic and manual spray equipment, natural gas-fired air supply houses, bake oven, and thermal oxidizer.

- 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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows (a, b, c) detailing emission control requirements for the topcoat coating line.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
e.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
g.	OAC rule 3745-17-10(B)(from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-07(A)(from the indirect-fired oven zones 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.
i.	40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 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.

(2) Additional Terms and Conditions

- a. 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.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation

- c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
- d. The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect 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.
- f. 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).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- i. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)] [OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

- (2) 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.
- (3) The permittee shall burn only natural gas in this emissions unit.
- (4) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)] [OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

- (6) 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 maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
 - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for

"Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (2) 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
 - c. 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).
- (3) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (4) 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.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (8) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were

completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

- (10) 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.
- (11) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart III, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- 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)(1), above.
 - All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
 - All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
 - 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;
 - 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;
 - all instances when a fuel other than natural gas was burned in this emissions unit; and

- g. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1). of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(1) of this permit.
 - b. Emission Limitation:

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 d)(3) of this permit.
 - 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)(4), of this permit.

d. Emission Limitations:

0.26 lb PM10/hr;

0.031 lb SO₂/hr;

5.13 lbs NO_x/hr;

4.31 lbs CO/hr; and

0.27 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 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 NO_x: 100 lbs NO_x/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 A.

** For NO_x, 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.

Applicable Compliance Method:

Compliance will be assured based on the recordkeeping in Section d)(10), of this permit.

e. Emission limitation:

214.64 lbs VOC per hour

The above limitation was established based on the following equation:



HER = {[(Cu x VC) x Ce] x (1 - De)} + [(Cu x VC) x (1-Ce)]

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

Applicable Compliance Method:

Compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.

f. Emission Limitation:

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

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) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping in Sections d)(5) thru (9), of this permit, and the maintenance and upkeep of the water wash control system.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in d)(1), of this permit.

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

- a. Within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA.
- b. Demonstrate the actual capture efficiency of the overall VOC emissions being emitted from the emissions unit;
- c. Demonstrate compliance with the allowable hourly emission limitation of 214.64 lbs of VOC;
- d. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- e. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- v. v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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

- f. The test(s) shall be conducted while the emissions unit is operating at or near its normal operation levels and throughput, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office.

- (3) Formulation data or USEPA Method 24 shall be used to determine the 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.

- g) Miscellaneous Requirements
 - (1) None.



11. K006, Topcoat Coating Line B

Operations, Property and/or Equipment Description:

Topcoat coating line B with robotic and manual spray equipment, natural gas-fired air supply houses, bake oven, and thermal oxidizer.

- 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) and (PTI 05-07923)	Hourly emissions from the coating operation shall not exceed: 214.64 lbs VOC; and/or 10.8 lbs of particulate emissions (PE), from overspray. Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator: 0.26 lb PM10/hr; 0.031 lb SO2/hr; 5.13 lbs NOx/hr; 4.31 lbs CO/hr; and 0.27 lb VOC/hr. See Sections b)(2)a. thru e, c)(1) thru (3), d)(1) thru (5) and (11), e)(1), f)(1)a. thru f., and f)(2), below.
b.	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C) (from overspray associated with this emissions unit)	The use of an overspray control system. See Sections b)(2)h. and i.c)(5) and (6), d)(6) thru (10), and e)(1), below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
e.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
g.	OAC rule 3745-17-10(B)(from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-17-07(A)(from the indirect-fired oven zones 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.
i.	40 CFR Part 63 Subpart IIII	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart IIII, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR 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.

(2) Additional Terms and Conditions

- a. 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.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation



- c. The VOC emissions from this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.
- d. The 214.64 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect 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.
- f. 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).
- g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- i. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)] [OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the oven associated with this emissions unit is processing units, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

- (2) 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.
- (3) The permittee shall burn only natural gas in this emissions unit.
- (4) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)] [OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

- (6) 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 maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
 - i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for

"Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (2) 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
 - c. 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).
- (3) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (4) 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.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (8) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were

completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

- (10) 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.
- (11) The permittee shall comply with the applicable notification(s), report(s) and record(s) as specified in 40 CFR Part 63, Subpart III, (Surface Coating of Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1), above.
 - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
 - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
 - d. 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;
 - e. 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;
 - f. all instances when a fuel other than natural gas was burned in this emissions unit; and



- g. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

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

- a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(1) of this permit.

- b. Emission Limitation:

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 d)(3) of this permit.

- 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)(4), of this permit.

d. Emission Limitations:

0.26 lb PM10/hr;

0.031 lb SO2/hr;

5.13 lbs NOx/hr;

4.31 lbs CO/hr; and

0.27 lb VOC/hr.

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (51,300 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 A.

** 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.

Applicable Compliance Method:

Compliance will be assured based on the recordkeeping in Section d)(10), of this permit.

e. Emission limitation:

214.64 lbs VOC per hour

The above limitation was established based on the following equation:



$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

Applicable Compliance Method:

Compliance shall be determined based on the stack testing as required under Section f)(2) of this permit.

f. Emission Limitation:

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

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) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

10.8 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;



Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping in Sections d)(5) thru (9), of this permit, and the maintenance and upkeep of the water wash control system.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in d)(1), of this permit.

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

- a. Within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office or is testing requested by the Ohio EPA.
- b. Demonstrate the actual capture efficiency of the overall VOC emissions being emitted from the emissions unit;
- c. Demonstrate compliance with the allowable hourly emission limitation of 214.64 lbs of VOC;
- d. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
- e. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);

- iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
- v. v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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

- f. The test(s) shall be conducted while the emissions unit is operating at or near its normal operation levels and throughput, unless otherwise specified or approved by Ohio EPA Southwest District Office. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office.

- (3) Formulation data or USEPA Method 24 shall be used to determine the 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.

- g) Miscellaneous Requirements
 - (1) None.



12. K007, Primary Topcoat On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, and bake oven.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) None.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific 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.

Table with 3 columns: Emissions Unit, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-07923) with VOC, PE, and natural gas combustion limits. Row b: OAC rule 3745-17-07(A)(1) with visible PE limit. Row c: OAC rule 3745-17-11(C) with overspray control system requirement.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	overspray associated with this emissions unit)	See Sections b)(2)f. and g., c)(3) and (4), d)(6) thru (10), and e)(1), below.
d.	40 CFR, Part 60, Subpart MM, 60.392(b)	The pounds of VOC per gallon of applied solids limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined). See Sections d)(4), and e)(1), below.
	OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average. See Sections d)(4), and e)(1), below.
	OAC rule 3745-21-09(C)(1)	The emission limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	b)(2)f, below.
	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	b)(2)g, below.
	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A) (for the indirect-fired oven zones 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%



Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176) vs. 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.

(2) Additional Terms and Conditions

- a. 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.
b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
c. The 89.3 lbs VOC per hour limitation was established for permitting purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for permitting purposes to reflect 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
e. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]



- g. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

[OAC rule 3745-17-11(C)(1)] [OAC rule 3745-77-07(C)(1)]

c) Operational Restrictions

- (1) 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.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)] [OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

- (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 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
 - c. 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).
- (2) 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. 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (3) The permittee shall maintain the following monthly records on all primer/surfacer coatings employed in emissions units K003 and K007:
- a. the name and identification number of each coating;
 - b. the amount of each coating employed, in gallons per month;
 - c. the VOC content of each coating employed, in pounds of VOC per gallon;
 - d. the VOC content of each coating employed, in pounds of VOC per gallon employed, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
 - i. calculations showing the monthly and rolling 12-month VOC emissions for this emissions unit.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM and OAC rule 3745-21-09(C)(4).

- (4) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
- a. the name and identification number of each topcoat employed;

- b. the number of gallons employed of each coating;
- c. the VOC content, in pounds of VOC per gallon;
- d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids;
- i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198); and
- j. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations.

- (5) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
 - a. the number of units processed; and
 - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (9) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

- (11) 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.
- (12) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all instances when the calculated daily volume weighted average VOC emissions from the use of guidecoat in this emissions unit exceed 1.06 kg/liter (8.85 lbs/gal) of applied solids;
 - b. All exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units;

- c. All exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units;
- d. all instances when a fuel other than natural gas was burned in this emissions unit;
- e. all instances when the total product exceeds exceed 31,000 units per month;
- f. all instances when the total product exceeds 267,000 units per rolling, 12-month;
- g. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or
- h. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- i. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

1.06 kg of VOC/ liter (8.85 lbs of VOC/gallon) of applied solids, as a daily, volume-weighted average, from all primer/surfacer coatings employed in emissions units K003 and K007.

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(4).



b. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(4) of this permit.

c. Emission Limitation:

1.47 kg VOC/liter of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(4) of this permit.

d. Emission Limitation:

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 d)(2), of this permit.

e. 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)(3), of this permit.



f. Emission Limitations:

5.19 pounds of particulate emissions (PE) per hour, from overspray

The above allowable was established based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping in Sections d)(5) thru (9), of this permit, and the maintenance and upkeep of the water wash control system.

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.

g. Emission Limitations:

0.20 lb PM10/hr;

0.02 lb SO2/hr;

4.05 lbs NOx/hr;

3.40 lbs CO/hr; and

0.21 lb VOC/hr

The above allowable were determined based on the following equation(s) and information:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,450 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 A.

** 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

Applicable Compliance Method:

Compliance will be assured based on the recordkeeping in Section d)(11), of this permit.

h. Emission limitation:

89.3 lbs VOC per hour

The above allowable is established based on the following equation:

HER = (Cu x VC)

Where:

HER = maximum Hourly Emission Rate, in lbs/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

g) Miscellaneous Requirements

(1) None.



13. K008, Secondary Topcoat On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat on-line repair booth (manual spray), natural gas-fired air supply houses, and bake oven.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) None.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific 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.

Table with 3 columns: Emissions Unit, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-7923) with VOC and particulate emission limits. Row b: OAC rule 3745-17-07(A)(1) with visible particulate opacity limit. Row c: OAC rules 3745-17-11(C) with overspray control system requirement.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Sections b)(2)f. and g., c)(3) and (4), d)(6) thru (10), and e)(1), below.
d.	40 CFR, Part 60, Subpart MM, 60.392(c)	VOC emissions shall not exceed 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
e.	OAC rule 3745-21-09(C)(1)(c) and 3745-21-09(C)(2)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
f.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
g.	OAC rule 3745-17-11(B) (from the direct-fired oven zones associated with this emissions unit)	b)(2)e, below.
h.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by 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) (from the indirect-fired oven zones 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.
j.	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.

(2) Additional Terms and Conditions

- a. 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.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 8.7 lbs VOC per hour limitation was established for permitting purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- d. The emission limitations for PM10, SO₂, NO_x, CO and VOC from natural gas combustion in the drying oven, and the air supply houses, were established for permitting purposes to reflect 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.
- e. 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).
- f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- g. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) 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.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by

the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)]

[OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

- (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 maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
- a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
 - h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids;
 - i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198); and
 - j. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- (2) 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
 - c. 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).
- (3) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (4) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- (5) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units;

- b. All exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units;
- c. all instances when a fuel other than natural gas was burned in this emissions unit;
- d. all instances when the total product exceeds exceed 31,000 units per month;
- e. all instances when the total product exceeds 267,000 units per rolling, 12-month;
- f. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or
- g. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- h. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1), of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(1), of this permit.



b. Emission Limitation:

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 d)(2), of this permit.

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)(3), of this permit.

d. Emission Limitations:

8.7 pounds of VOC per hour

The above allowable is based on the following equation:

$$HER = M_{cu} \times VOC_c$$

Where:

HER = Hour Emission Rate, lbs per hour;

M_{cu} = Maximum Hourly Coating Usage, gallons per hour; and

VOC_c = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.



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 24 or an appropriate alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

e. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established d)(1), of this permit.

f. Emission Limitations:

0.42 pounds of particulate emissions (PE) per hour, from overspray

The above allowable is based on the following equation:

HER = [Mcu x Hsc x (1-Te)] x (1- Ce)

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred;

and

Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.



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.

g. Emission Limitations:

0.21 lb PM10/hr;

0.025 lb SO₂/hr;

4.08 lbs NO_x/hr;

3.43 lbs CO/hr; and

0.22 lb VOC/hr.

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (40,800 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 NO_x: 100 lbs NO_x/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 A.** For NO_x, 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

h. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent 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) and 40 CFR Part 60, Appendix A, Method 9.

- (2) Formulation data or USEPA Method 24 shall be used to determine the 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.

g) Miscellaneous Requirements

- (1) None.



14. K009, Wax/Polish Coating Line

Operations, Property and/or Equipment Description:

Coating booths with manual wax application equipment and natural gas-fired air supply houses

- 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 'a.' contains details for OAC rule 3745-31-05(A)(3) and (PTI 05-07923), including VOC content limitations, particulate emissions, and natural gas combustion emissions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		g., and f)(2), below.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rules 3745-17-11(C)	The use of an overspray control system. See Sections b)(2)h and i., c)(3) and (4), d)(6) thru (10), and e)(1), below.
d.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoat employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
e.	OAC rule 3745-21-09(C)(1)(c)	The combined VOC emissions from the use of topcoat in emissions units K005, K006, K007, K008, K009 and K012 shall not exceed 15.1 pounds of VOC per gallon of applied solids, as based on a daily volume weighted average.
f.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
g.	OAC rule 3745-21-09(U)(2)(f)	b)(2)g, see below
h.	OAC rule 3745-17-(11)(B) (for the air supply houses associated with this emissions unit)	b)(2)e, see below
i.	OAC rule 3745-17-07(A) (for the air supply houses associated with this emissions unit)	b)(2).f, below
j.	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.

- (2) Additional Terms and Conditions
- a. 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.
 - b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
 - c. The 87.2 lbs VOC per hour limitation was established for permitting purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
 - d. The emission limitations for PM10, SO₂, NO_x, CO and VOC from natural gas combustion in the air supply houses were established for permitting purposes to reflect 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.
 - e. The uncontrolled mass rate of particulate emissions (PE) from all the 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).
 - f. The PE from the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
 - g. Pursuant to OAC rule 3745-21-09(U)(2)(f), the Director has determined that "best available technology" for this emissions unit, as defined in PTI 05-07923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
 - h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]



- i. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)]

[OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

- (4) 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.
- (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 maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;
 - c. the VOC content, in pounds of VOC per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the water and exempt solvent content, in percent by volume;
 - f. the nonvolatile (solids) content, in percent by volume;
 - g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;

- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids;
- i. the amount of VOC emitted, in kg per liter of applied solids ("h" x 0.1198); and
- j. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- (2) The permittee shall maintain the following monthly records on all coatings other than topcoats employed in this emissions unit:
 - a. the name and identification number of each coat employed;
 - b. the amount of each coat employed, in gallons per month, excluding water and exempt solvents;
 - c. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents;
 - d. the calculated VOC generated from each coat employed, in pounds of VOC per month, (the summation of "b" x "c");
 - e. the combined VOC emissions from all of the non-topcoat coatings employed in this emissions unit, in pounds of VOC per month (the summation of "d" from all of the non-topcoat coatings employed in this emissions unit);
 - f. the combined non-topcoat coating usage employed in this emissions unit, in gallons per month, (summation of "b" from all of the non-topcoat coatings employed in this emissions unit); and
 - g. the volume weighted average VOC content of all non-topcoat coatings employed in this emissions unit, in pounds of VOC per gallon, excluding water and exempt solvents.
- (3) 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
 - c. 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).

- (4) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (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.
- (6) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
- a. the number of units processed; and
 - b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- [OAC 3745-17-11(C)(2)(a)]
- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- the VOC content of the coatings employed in this emissions unit, excluding topcoat operations, exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit;
 - All exceedances of the allowable VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average from topcoats employed in combined emissions units;
 - All exceedances of the allowable VOC emission rate of 1.47 kgs /liter (12.27 lbs/gallon) of applied solids, as a monthly volume-weighted average from topcoats employed in combined emissions units;

- d. all instances when a fuel other than natural gas was burned in this emissions unit;
- e. all instances when the total product exceeds exceed 31,000 units per month;
- f. all instances when the total product exceeds 267,000 units per rolling, 12-month;
- g. all instances in which the total VOC emissions, for emissions units K001 - K003 and K005 - K012, combined, excluding cleanup/purge material usage, exceeds 1268.65 tons per rolling, 12-month summation; and/or
- h. all instances in which the total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1), of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average [from all topcoat operations - emissions units K005, K006, K007, K008, K009* and K012*, combined].

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(1), of this permit.
 - b. Emission Limitation:

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)(3), of this permit.

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 Section d)(4), of this permit.

d. Emission Limitations:

The VOC content of the coatings employed in this emissions unit, excluding topcoat operations, shall not exceed 5.32 lbs per gallon of coating, excluding water and exempt solvents, as based a monthly volume weighted average of all the coatings employed in this emissions unit.

Applicable Compliance Method:

Compliance with the allowable HAP emission limitations shall be determined through the record keeping requirements established in d)(2).

e. Emission Limitations:

0.29 pounds of particulate emissions (PE) per hour, from overspray

The above allowable is based on the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and



Ce = Overall control efficiency of the particulate control system).

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

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.

f. Emission Limitations:

87.2 pounds of VOC per hour

The above allowable is based on the following equation:

$$HER = M_{cu} \times VOC_c$$

Where:

HER = Hour Emission Rate, lbs per hour;

M_{cu} = Maximum Hourly Coating Usage, gallons per hour; and

VOC_c = Highest VOC content coating employed, in lbs of VOC per gallon of coating.

Applicable Compliance Method:

Compliance shall be based on data from Honda that determined to potential hourly operations of this emissions unit. If future changes to this emissions unit and/or updated data determines that the hourly emissions rate is greater than the above potential hourly rate, this emissions unit will need to be reviewed under all applicable air pollution permit requirements to address the increase in potential emissions.

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 24 or an appropriate alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

g. Emission Limitations:

0.07 lb PM10/hr;



0.009 lb SO₂/hr;

1.49 lbs NO_x/hr;

0.3 lbs CO/hr; and

0.08 lb VOC/hr.

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (14,850 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 NO_x: 100 lbs NO_x/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 A.

** For NO_x, 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.

h. Emission Limitations:

Visible PE from the stack shall not exceed twenty percent 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) and 40 CFR Part 60, Appendix A, Method 9.

i. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established d)(1), of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the 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.
- g) Miscellaneous Requirements
- (1) None.



15. K011, Final Repair

Operations, Property and/or Equipment Description:

Coating booths and area including manual coating applicators for final off-line repair and infrared bake ovens/lamps

- 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.

Table with 3 columns: Emissions Unit ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It contains three rows of data detailing emission limits and control measures for different units.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(C)(1)(d)	4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average
e.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
f.	OAC rule 3745-17-(11)(B) (for the oven associated with this emissions unit)	b)(2)e, below.
g.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
h.	OAC rule 3745-17-07(A) (for the oven associated with this emissions unit)	b)(2)f, below.

(2) Additional Terms and Conditions

- a. 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.
- b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
- c. The 15.8 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- d. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect 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.
- e. The uncontrolled mass rate of particulate emissions (PE) from all the 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).
- f. The PE for the fuel burning equipment associated with this emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A),

pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

- g. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- h. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) **Operational Restrictions**

- (1) 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.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain daily records that list the following information on the coatings employed in this emissions unit:\
- a. the name and identification number of each coating;
 - b. the number of gallons employed;
 - c. the VOC content, in pounds per gallon;
 - d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
 - e. the daily volume weighted VOC content of all coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

- f. the water and exempt solvents content, in percent by volume;
 - g. the nonvolatile (solids) content, in percent by volume; and
 - h. calculations showing the 12-month VOC emissions, in tons per rolling 12-month period.
- (2) 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
 - c. 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).
- (3) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (4) For each day that the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of the fuel burned.
- (5) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
- a. the number of units processed; and

- b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (9) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. the VOC content exceed 4.8 pounds VOC per gallon of coating, excluding water and exempt solvents, as a daily, volume-weighted average;
 - b. the VOC emissions from the use of coatings exceed 6.0 tons per rolling 12-month period;
 - 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; and
 - 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.
 - e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

4.8 lbs VOC/gallon of coating, excluding water and exempt solvent, as a daily, volume-weighted average

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements established in d)(1), of this permit.
 - b. Emission Limitation:

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 d)(2), of this permit.

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)(3), of this permit.

d. Emission Limitation:

0.04 lb PM10/hr;

0.005 lb SO₂/hr;

0.85 lbs NO_x/hr;

0.72 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 (8,525 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 NO_x: 100 lbs NO_x/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 A.

** For NO_x, 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



e. Emission Limitation:

15.8 lbs VOC/hr;

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = [Cu * VC]$$

Where:

HER = maximum Hourly Emission Rate, in lbs of VOC/hr;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents; and

VC = maximum coating VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-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) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

1.26 pounds PE/hr, from coating overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;



Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

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.

h. Emission limitation:

6.0 tons of VOC per rolling 12-month period

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in d)(1).

i. Formulation data or USEPA Method 24 shall be used to determine the 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.

g) Miscellaneous Requirements

(1) None.



16. K012, Specialty Topcoat Coating and On-Line Repair

Operations, Property and/or Equipment Description:

Topcoat coating and on-line repair booths, natural gas-fired air supply house, bake oven, and thermal oxidizer.

- 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) and (PTI 05-07923)	<p>The emissions from this emissions unit shall not exceed:</p> <p>(VOC) emissions shall not exceed 17.4 lbs per hour; and 0.5 lbs of particulate emissions (PE) per hour.</p> <p>Emissions from natural gas combustion in the drying oven, the air supply houses, and the incinerator:</p> <p>0.14 lb PM10/hr; 0.02 lb SO2/hr; 2.85 lbs NOx/hr; 2.40 lbs CO/hr; and 0.15 lb VOC/hr.</p> <p>See Sections b)(2)a., b., c., and e., below.</p>
b.	OAC rule 3745-17-07(A)(1) (from the overspray associated with this emissions unit)	Visible PE from the stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B) (from the overspray associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR, Part 60, Subpart MM	1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
e.	OAC rule 3745-21-09(C)(1)(c)	15.1 lbs VOC/gallon of applied solids, as a daily, volume-weighted average (from all the topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).
f.	OAC rule 3745-21-09(U)(1)(i)	3.0 lbs of VOC/ gallon of coating, minus water and exempt solvent, as applied (when coating miscellaneous metal parts)
g.	OAC rule 3745-18-06(E)	The SO2 emission limitation specified by this rule is less stringent than the SO2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3) (for the drying oven associated with this emissions unit).
h.	OAC rule 3745-11-09(B) (from the direct-fired oven zones associated with this emissions unit)	b)(2)f, below.
i.	OAC rule 3745-17-10(B) (from the indirect-fired oven zones associated with this emissions unit)	The PE limitation specified by this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).
j.	OAC rule 3745-17-07(A) (from the direct-fired oven zones associated with this emissions unit)	b)(2)g, below.
k.	OAC rule 3745-17-07(A) (from the indirect-fired oven zones 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.
l.	OAC rule 3745-17-11(C) (from overspray associated with this emissions unit)	The use of an overspray control system. See Sections b)(2)g. and h., c)(6) and (7), d)(11) thru (16), and e)(1), below.
m.	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



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: comply with the applicable requirements of the most recent promulgation.

(2) Additional Terms and Conditions

- a. 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.
b. The total VOC emissions for cleanup/purge materials, for emissions units K001 - K003, K005 - K012, P001, P003 - P005, P014, P016 and P017, combined, shall not exceed 38.44 tons/month and 103.3 tons per rolling, 12-month summation.
c. The VOC emissions from the use of topcoats that are baked in this emissions unit shall be vented to a thermal incinerator with a minimum destruction efficiency of 90%, by weight, for VOC.

The requirement to vent emissions to a thermal oxidizer does not include emissions from any topcoat that is air-dried. Air-dry coatings are materials that do not require baking to fully cure and baking is not required to ensure the performance characteristics of the coatings.

- d. The 17.4 lbs VOC per hour limitation was established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
e. The emission limitations for PM10, SO2, NOx, CO and VOC from natural gas combustion in the drying oven, the air supply houses, and the incinerator were established for PTI purposes to reflect 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.
f. 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).
g. The PE from the direct-fired fuel burning equipment associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in



this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- i. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation and applying any topcoat that requires baking, shall not be more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- (2) 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.
- (3) The permittee shall burn only natural gas in this emissions unit.
- (4) The permittee shall operate a filter control system whenever this emissions unit is in operation.
- (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.
- (6) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records on all topcoats employed in each of the following emissions units K005, K006, K007, K008, K009 and K012:
 - a. the name and identification number of each topcoat employed;
 - b. the number of gallons employed of each coating;

- c. the VOC content, in pounds of VOC per gallon;
- d. the VOC content, in pounds per gallon, excluding water and exempt solvents;
- e. the water and exempt solvent content, in percent by volume;
- f. the nonvolatile (solids) content, in percent by volume;
- g. calculations showing the monthly volume weighted average mass of VOC per volume of applied coating solids;
- h. calculations showing the daily volume weighted average of VOC per gallon of deposited solids; and
- i. calculations showing the monthly and rolling 12-month VOC emissions.

These records and calculations shall be conducted and maintained in compliance with the requirements of 40 CFR Part 60, Subpart MM, and the USEPA's Protocol for "Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations."

- (2) The permittee shall maintain the following monthly records on all coatings used to coat miscellaneous metal parts in this emissions unit:
 - a. the name and identification number of each coat employed; and
 - b. the VOC content of each coat employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
- (3) 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
 - c. 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).
- (4) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (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.
- (6) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (7) The permittee shall maintain records that document any time periods when the filter control system serving this emissions unit was not in service while this emissions unit was operating.
- (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 emissions unit is in operation and applying any topcoat that requires baking. 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 emissions unit was in operation and applying topcoat that requires baking, 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) The permittee shall maintain the following monthly records on all non-topcoat coating used to coat the surface of automobiles and light-duty trucks in this emissions unit:
- a. the name and identification number of each coating employed; and

- b. the VOC content of each coating employed, in pounds of VOC per gallon of coat employed, excluding water and exempt solvents.
- (10) 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 Automobile and Light-Duty Trucks), in accordance with 40 CFR Parts 63.3110 through 63.3176
- (11) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- [OAC 3745-17-11(C)(2)(a)]
- (12) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- [OAC rule 3745-17-11(C)(2)(c)]
- (13) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- [OAC rule 3745-17-11(C)(2)(c)]
- (14) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (15) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified in c)(1),. above.
 - b. All exceedances of the allowable, controlled VOC emission rate of 1.47 kgs/liter (12.27 lbs/gal) of applied solid, as a monthly volume-weighted average.
 - c. All exceedances of the allowable, controlled VOC emission rate of 15.1 lbs/gallon of applied solids, as a daily, volume-weighted average.
 - d. 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; e. 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 f. the VOC content of coatings employed in coating miscellaneous metal parts in this emissions unit exceeds 3.0 lbs of VOC per gallon, minus water and exempt solvents.
 - e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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.
- (3) 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 and applying any topcoat that requires baking.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all times during which the filter control system was not in service while the emissions unit was in

operation. The notification shall include a copy of such record and shall be submitted by the dates specified in Part I - General Terms and Conditions A.1. of this permit.

- (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.

f) Testing Requirements

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

a. Emission Limitation:

15.1 lbs VOC per gallon of applied solids, as a daily, volume-weighted average (from the use of topcoats in emissions units K005, K006, K007, K008, K009 and K012, combined)

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation shall be determined through the record keeping requirements established in d)(1), of this permit.

b. Emission Limitation:

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)(3), of this permit.

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)(4), of this permit.



d. Emission Limitations:

0.14 lb PM10/hr 0.02 lb SO2/hr 2.85 lbs NOx/hr 2.40 lbs CO/hr 0.15 lb VOC/hr

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (28,500 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 A.

** 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

e. Emission limitation:

17.4 lbs VOC per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

$$HER = \{[(Cu \times VC) \times Ce] \times (1 - De)\} + [(Cu \times VC) \times (1 - Ce)]$$

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

Cu = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

VC = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency (as determined during the most recent compliance test); and

De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test).

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as



appropriate, of 40 CFR, Part 60, Appendix A. Alternatively, instead of the above list test methods of 40 CFR Part 60, Appendix A can be used in accordance with MACT Subpart IIII.

f. Emission Limitation:

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

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) and 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitations:

0.5 pounds of particulate emissions (PE) per hour, from overspray

Applicable Compliance Method:

Compliance with the allowable particulate emission limitations shall be determined through the use of the following equation:

$$HER = [Mcu \times Hsc \times (1 - Te)] \times (1 - Ce)$$

Where:

HER = Hour Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

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.

h. Emission Limitation:

1.47 kgs VOC/liter (12.27 lbs/gallon) of applied solids, as a monthly, volume-weighted average (from all topcoats employed in emissions units K005, K006, K007, K008, K009 and K012, combined).

Applicable Compliance Method:

Compliance with the mass VOC emissions per volume of applied solids limitation above shall be determined through the record keeping requirements established in d)(1), of this permit.

- (2) If required permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.
 - b. The following test methods shall be employed to demonstrate compliance:
 - i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
 - ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
 - iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
 - iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and
 - v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

In accordance with OAC rule 3745-21-09(C)(4), capture efficiency shall be determined as required by USEPA's, "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations." The permittee shall follow the testing procedures as prescribed by the Protocol.

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

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



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office.

- (3) Formulation data or USEPA Method 24 shall be used to determine the 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.

g) Miscellaneous Requirements

- (1) None.



17. K013, Assembly Miscellaneous Coating Line

Operations, Property and/or Equipment Description:

Application of primer on metal surfaces for the installation of fixed quarter and windshield glass.

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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-07923) with VOC and OC emission limits. Row b: 40 CFR Part 63 Subpart IIII (40 CFR 63.3080 - 3176) with reference to emission limitations.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Should Subpart IIII be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.
c.	OAC rule 3745-21-09(U)(2)(f)(ii)	Alternative reasonably available control technology emission limitation, when coating miscellaneous metal parts. See section b)(2)b., below
d.	OAC rule 3745-21-07(G)	When coating non-metal parts. See sections b)(2)c., c)(2), d)(2), and e)(3), below.
e.	OAC rule 3745-17-11(C) (from overspray associated with this emissions unit)	The use of an overspray control system. See Sections b)(2)d. and e., c)(4) and (5), d)(5) thru (9), and e)(1), below.

(2) Additional Terms and Conditions

- a. The 19.6 lbs VOC per hour limitation and the 5.8 lbs OC per hour limitation were established for PTI purposes to reflect potentials to emit for this emissions unit. Therefore, it is not necessary to require record keeping and reporting requirements to ensure compliance with these limits.
- b. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), the director has determined that "best available technology" for this emissions unit, as defined in PTI # 05-7923, is a control requirement or emission limitation that is either less stringent than or inconsistent with the requirements of paragraph (U)(1) of OAC rule 3745-21-09. Specifically, the VOC content limitation in the PTI for the coatings is less stringent than the applicable VOC content limitation in paragraph (U)(1) of OAC rule 3745-21-09.
- 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:
 - i. Section c)2);
 - ii. Section d)(2), recordkeeping requirements; and

iii. Section e)(3), reporting requirements.

[OAC rule 3745-21-07]

d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

e. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) **Operational Restrictions**

(1) 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.

(2) The permittee shall not employ any liquid organic material, except for those materials employed to coat metal parts, which is a photochemically reactive material in this emissions unit. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

(3) 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.

(4) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1)]

(5) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall collect and record the following information each month for all the miscellaneous metal coatings employed for this emissions unit:

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

- b. the VOC content (in lbs/gallon, excluding water and exempt solvents) of each coating, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the monthly, volume-weighted average VOC content of all the coatings (in lbs/gallon, excluding water and exempt solvents), as applied, calculated in accordance with OAC rule 3745-21-10(B);
 - e. the total VOC emissions for all the coatings employed, in pounds, i.e., multiply the VOC content of each coating employed (b) by the respective amount, in gallons, of each coating employed (c), and sum the results for all the coatings employed; and
 - f. the rolling, 12-month VOC emissions for all the coatings employed, in tons.
- (2) The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:
- a. the name and identification number of each liquid organic material employed;
 - b. whether or not the liquid organic material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC and organic compound (OC) contents for each liquid organic material employed, in pounds per gallon;
 - d. the volume, in gallons, of each liquid organic material employed;
 - e. the total VOC and OC emission rates, in tons, per month;
 - f. 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 ("e") plus the total amount of VOC emissions for the 11 previous calendar months): and
 - g. the rolling, 12-month total combined OC emitted from the above listed emissions units, in tons (the total individual OC emitted, in tons, for the current month ("e") plus the total amount of OC emissions for the 11 previous calendar months).
- (3) 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.
- (4) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
- a. the number of units processed; and

- b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months).
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the monthly volume-weighted VOC content, of all coatings used to coat miscellaneous metal parts, exceed 6.54 lbs per gallon of coating, excluding water and exempt solvents;
 - b. the VOC emissions exceed 29.2 tons per rolling, 12-month summation, for all the coatings employed;
 - c. the organic compound (OC) emissions, from the liquid organic materials, not related to the metal coating operations in this emissions unit, exceed 9.98 tons per rolling, 12-month summation; and
 - d. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) 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.
- (3) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

f) Testing Requirements

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

- a. Emission Limitation:

The VOC emissions from the coatings employed shall not exceed 19.6 pounds hour.

Applicable Compliance Method:

Compliance may be determined by the following equation:

$$HER = [Cu * VC]$$



Where:

HER = the maximum VOC Hourly Emission Rate, in lbs/hr;

Cu = the maximum potential coating usage rate, in gallons/hr; and

VC = the maximum coating VOC content, in pounds per gallon.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: The OC emissions from the use of miscellaneous solvents employed shall not exceed 5.8 pounds hour.

Applicable Compliance Method:

Compliance may be determined by the following equation:

HER = [Su * VC]

Where:

HER = the maximum VOC Hourly Emission Rate , in lbs/hr;

Su = the maximum potential solvent usage rate, in gallons/hr; and

VC = the maximum solvent VOC content, in pounds per gallon

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- c. Emission Limitation:

29.2 tons VOC per rolling, 12-month summation, from the use of coatings.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined through the record keeping requirements specified in d)(1) of this permit.

- d. Emission Limitation:

9.98 tons OC per rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation shall be determined through the record keeping requirements specified in d)(2), of this permit.

- e. Emission Limitation:



6.54 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly, volume-weighted average, when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined through the record keeping requirements specified in d)(1), of this permit.

- (2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

- (1) None.



18. K015, Plastic Coating Line

Operations, Property and/or Equipment Description:

Plastic Parts Coating Line including primer booth, basecoat booth, clearcoat booth, paint mix room, flash-off areas, drying oven, and burners associated with air supply houses.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) b)(1)g., d)(4), d)(5), d)(6), d)(7), and e)(2).
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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3) and (PTI 05-10278) with VOC and PM limits and natural gas combustion details. Row b: OAC rule 3745-31-05(D) (In order to minimize emissions) with VOC and PM limits.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR 63 Subpart PPPP (Surface coating of Plastic Parts and Products)	HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.
d.	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See sections b)(2)b., c)(4), d)(3), and e)(3), below.
e.	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-17-11(C) (from overspray associated with this emissions unit)	The use of an overspray control system. See Sections b)(2)c, c)(5) and (6), d)(9) thru (13), and e)(1), below.
g.	OAC Rule 3745-114-01	Ohio Toxic Rule

(2) Additional Terms and Conditions

- a. The pound per day limitations for VOC and PM are based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with these limits.
- b. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:
 - i. Section c)(4);
 - ii. Section d)(3), recordkeeping requirements; and
 - iii. Section e)(3), reporting requirements.

[OAC rule 3745-21-07]



- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes...

[OAC rule 3745-17-11(C)]

The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The maximum material usage for this emissions unit shall not cause VOC emissions to exceed 188 tons per rolling 12-month period...

AER = {[(C1 x OCc1) + (C2 x OCc2) + etc...] + [(S1 x OCs1) + (S2 x OCs2) + etc...] } / 2000 lbs/ton - (R / 2000lbs/ton)

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

S = usage of purge and cleanup solvent j, in gallons;

OCc = organic compound content of the coatings, in pounds per gallon;

OCs = organic compound content of the solvents, in pounds per gallon;

R = amount of OC recovered in the purge system, in pounds; and 1,2, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.

- (2) The maximum material usage for this emissions unit shall not cause PM emissions to exceed 8.64 tons per rolling 12-month period...

AER = ([(C1 x D1 x S%1) + (C2 x D2 x S%2) + etc...] x (1-TE)) x (1-RE) / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

D = density of coating, in pounds per gallons;

S% = non-volatile percentage (solids) of coating i, in percent by weight;

TE = transfer efficiency of the coating onto the substrate (%);

RE = particulate removal efficiency of the underbooth waterwash system (%); and

1,2, etc.. = individual coating, density, and specific OC content for each coating.

- (3) In accordance with 40 CFR Part 63, Subpart PPPP, the permittee shall employ material compliant with the HAP emissions limitations as outlined in 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.
- (4) The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- (5) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(C)(1)]
- (6) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for the purpose of determining the annual particulate matter emissions, based upon a 12-month summation of the monthly emissions:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the density of each coating, in pounds per gallon;
 - d. the non-volatile percentage (solids) of each coating, in percent by weight; and
 - e. the rolling, 12-month summation of the total PM emissions, according to the formula in c)(2).
- (2) The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

- c. the volatile organic compound content of each coating and cleanup material, in pounds per gallon; and
 - d. the rolling, 12-month summation of the total controlled VOC emissions, according to the formula in c)(1).
- (3) The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:
 - a. the name and identification number of each liquid organic material employed;
 - b. whether or not the liquid organic material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- (4) The permittee shall collect and maintain all applicable records in accordance with the requirements of 40 CFR Part 63, Subpart PPPP and in a manner to demonstrate continual compliance with the HAP emissions limitations as defined in 40 CFR 63.4490, or the applicable record keeping requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481
- (5) The PTI application for this emissions unit, K015, was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Cyclohexanone

TLV (mg/m³): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1113.1

MAGLC (ug/m³): 2286

The permittee, has demonstrated that emissions of Cyclohexanone, from emissions unit K015, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

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

- (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. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit 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 "Toxic 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 "Toxic 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 "Toxic 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

- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

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

- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be

maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (11) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
- a. the VOC emissions exceed 188 tons per rolling 12-month period;



- b. the particulate emissions exceed 8.64 tons per rolling 12-month period; and
c. Any exceedance of the applicable HAP emissions limitations as defined in 40 CFR Part 63.4490, or any exceedance of the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.
d. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

- (3) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.

f) Testing Requirements

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

- a. Emission Limitation:

188 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section d)(2), of this permit.

- b. Emission Limitation:

Emissions of PM from this emission unit shall not exceed 8.64 tons per rolling 12-month period.



Applicable Compliance Method:

Compliance shall be determined by the monitoring and record keeping in section d)(1), of this permit.

c. Emission Limitation:

172 lbs PM/day – Overspray

Applicable Compliance Method:

Compliance with the hourly over-spray particulate emission limitation shall be determined using the following equation:

$$DER = \{[Mcu \times Hsc \times (1-Te)] \times (1- Ce)\} \times 24$$

Where:

DER = Daily Emission Rate, lbs per hour;

Mcu = Maximum Hourly Coating Usage, gallons per hour;

Hsc = Highest Solids Content of the coatings used in this emissions unit, in lbs per gallon of coating;

Te = Latest Transfer Efficiency results, in percentage transferred; and

Ce = Overall control efficiency of the particulate control system).

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.

d. Emission Limitation:

3512 lbs VOC/day

Applicable Compliance Method:

Compliance with the hourly over-spray particulate emission limitation shall be determined using the following equation:

$$DER = (\{[(C1 \times OCc1) + (C2 \times OCc2) + \text{etc...}] + [(S1 \times OCs1) + (S2 \times OCs2) + \text{etc...}]\} - (R)) \times 24$$

Where:

DER = Daily Emission Rate, in pounds;

C = usage of coating, in gallons per hour;

S = usage of purge and cleanup solvent, in gallons per hour;

OCc = organic compound content of the coatings, in pounds per gallon;

OCs = organic compound content of the solvents, in pounds per gallon;

R = amount of OC recovered in the purge system, in pounds; and 1,2, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.

Prior to modifying this emissions unit that would cause an increase in the daily potential, the permittee will need to apply for and obtain all appropriate air pollution permits.

e. Emission Limitation:

0.47 lb PM/hr, 2.04 TPY PM,

0.04 lb SO₂/hr, 0.16 TPY SO₂,

6.12 lbs NO_x/hr, 26.8 TPY NO_x,

5.14 lbs CO/hr, 22.51 TPY CO, and

0.67 lb TOC/hr, 2.95 TPY TOC.

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas usage rate (61,200 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 NO_x: 100 lbs NO_x/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 A.

** For NO_x, 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

f. Emission Limitation:

HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.



Applicable Compliance Method:

The permittee shall demonstrate compliance using the applicable requirements as detailed in 40 CFR Part 60 Subpart PPPP, 63.4540 through 63.4568 or the applicable requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

g) Miscellaneous Requirements

- (1) None.



19. K024, Spray Melt Sheet Operation

Operations, Property and/or Equipment Description:

Liquid applied sound deadener operation

- 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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include details for VOC emissions per hour, 12-month summation, coating material VOC content, and overspray control system.

(2) Additional Terms and Conditions

- a. The emission limitations for pounds of VOC emissions per hour, 24.7, are established to reflect the potential to emit for this emissions unit. Therefore, it is

not necessary to require record keeping and reporting requirements to ensure compliance with this limit.

- b. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- c. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

c) **Operational Restrictions**

- (1) The permittee shall employ a thermal incinerator at all times during operation of this emissions unit. The thermal incinerator shall have a destruction removal efficiency of at least 90%.

The VOC capture efficiency is conservatively assumed to be 95 percent. The capture efficiency assumption is based upon supplier information and the low vapor pressure of the solvents in the coating, as applied. The percent capture efficiency shall be adjusted if monitoring or testing provides a more accurate estimate for this emissions unit.

- (2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time while the emissions unit is operating, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated compliance.
- (3) The maximum combined material usage for this emissions unit shall not cause VOC emissions to exceed 28.7 tons of VOC per rolling 12 months, calculated using the following formula:

$$AER = \{ [(C1 \times OCc1) + (C2 \times OCc2) + \text{etc...}] \times Ce \} \times (1 - De) + \{ [(C1 \times OCc1) + (C2 \times OCc2) + \text{etc...}] \times (1 - Ce) \} / 2000 \text{ lbs/ton}$$

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

C = usage of coating, in gallons;

OCc = organic compound content of the coatings, in pounds per gallon;

Ce = capture efficiency, assumed to be 95% (based on best available information from Honda to date);

DE = destruction removal efficiency of the thermal incinerator^{1,2}, etc.. = individual coating, solvent, and specific OC content for each coating or solvent.

- (4) The VOC content of the coating material employed in this emissions unit shall not exceed 3.0 pounds per gallon, excluding water and exempt solvents.
- (5) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-17-11(C)(1) and (2)(b)] [OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature 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 emissions unit was in operation, was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emissions test that demonstrated 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.
- (2) The permittee shall collect and record the following information each month:
 - a. the name and identification of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, excluding water and exempt solvents; and
 - d. the rolling, 12-month summation of the total VOC emissions, according to the formula in c)(3).
 - (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with

documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

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

[OAC rule 3745-17-11(C)(2)(c)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

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

[OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

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



- a. The VOC content of the coating material employed in this emissions unit exceed 3.0 pounds per gallon, excluding water and exempt solvents.;
b. VOC emissions exceed 28.7 tons as a rolling, 12-month summation;
c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above;
d. all downtime of the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and
e. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

a. Emission limitation:

Volatile organic compound (VOC) emissions shall not exceed 24.7 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined as follows:

HER = {[Cu x VC] x Ce} x (1 - De)} + [(Cu x VC) x (1-Ce)]

Where:

HER = maximum Hour Emission Rate, in pounds per hour;

u = maximum potential coating usage per hour, in gallons, including water and exempt solvents;

C = maximum coating VOC content, in pounds per gallon;

Ce = capture efficiency, assumed to be 95% (based on best available information from Honda to date); and



De = destruction efficiency of the thermal incinerator (as determined during the most recent compliance test)

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

b. Emissions Limitation:

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

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound contents of the coatings employed.

c. Emissions Limitation:

Volatile organic compound (VOC) emissions shall not exceed 28.7 tons as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements in Section d)(2).

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

a. Destruction efficiency testing shall be conducted within 6 months prior to permit expiration, unless an alternative schedule is submitted and approved by Ohio EPA, Southwest District Office.

b. The emission testing shall be conducted to demonstrate compliance with the 90% destruction efficiency for the incinerator. The permittee shall also determine the VOC capture efficiency for this emissions unit.

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

- i. Method 1 of 40 CFR, Part 60, Appendix A (for sample and velocity traverses);
ii. Method 2 of 40 CFR, Part 60, Appendix A (for velocity and volumetric flow rates);
iii. Method 3 of 40 CFR, Part 60, Appendix A (for molecular weight of dry gas stream);
iv. Method 4 of 40 CFR, Part 60, Appendix A (for moisture content of gas stream); and

- v. Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A (for VOC emissions).

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office's refusal to accept the results of the emission test(s).

Personnel from Ohio EPA, Southwest 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Southwest 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 Ohio EPA, Southwest District Office.

Formulation data or USEPA Method 24 shall be used to determine the 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.

- g) **Miscellaneous Requirements**
- (1) None.



20. P004, Surfacers Sanding

Operations, Property and/or Equipment Description:

Surfacers Sanding

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) None.
b) Applicable Emissions Limitations and/or Control Requirements
(1) The specific 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.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include details for OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rule 3745-17-07(A), and OAC rule 3745-17-11.

(2) Additional Terms and Conditions

- a. The PE associated with this emissions unit are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-



07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

- b. The uncontrolled mass rate of particulate emissions (PE) from 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 this emissions unit is located in Logan County, which is specified in OAC rule 3745-17-11(B)(2).

c) Operational Restrictions

- (1) 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.
- (2) The permittee shall operate the filter system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the particulate filter system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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;
 - e. the total combined VOC emission rate, in tons, i.e., the summation of all VOC emissions as determined in (d); and
 - f. 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).
- (2) The permittee shall maintain the following monthly records on number of units processed through this emissions unit;
 - a. the number of units processed;



- b. the rolling, 12-month total number of units process, (the total number of units processed, for the current month ("a") plus the total number of units processed during the 11 previous calendar months); and
c. the total rolling, 12-month summation of controlled PE emissions from this emissions unit, (using the total number of units processed ("b") and the formula provided in section f)(1)a., below.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
a. The number of units processed exceed 267,000 units per rolling, 12-month summation; or
b. 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.

This deviation report shall be submitted according to the specific requirements of this permit.

f) Testing Requirements

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

a. Emission Limitations:

Particulate (PE) emissions of 0.88 lbs/hr, and 1.33 tons per rolling.

Compliance may be determined by the following equation:

HER = [Sum of all coatings sanded (Sv x Sd x Us)] x (1-Oc%)

AER = [Sum of all coatings sanded(Sv x Sd x Us)] x (1-Oc%)

Where:

HER = the maximum PE Hourly Emission Rate , in lbs/hr;

AER = Annual Emission Rate, in tons/yr;



Sv = the sand volume produced, cubic feet per unit, (0.000215 cubic feet/unit, EDP, and 0.000268 cubic feet/hr, Primer);

Sd = density of sand, lbs/cubic ft, (84.29 lbs/cubic feet, EDP, and 118.56 lbs/cubic feet, primer);

Us = Number of units sanded, (88 units/hr and 267,000 units/yr); and

Oc% = Estimated Overall Capture and Control Efficiency, (assumed 80%).

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.

* Note: Based on Honda's worst case potential estimates on number of vehicles processed through this emissions unit, sanding data, and solids density the potential uncontrolled emissions will be 6.66 tons of PE per year.

b. 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 Section d)(1), of this permit.

g) Miscellaneous Requirements

(1) None.



21. P021, Plastic Parts Painting Miscellaneous Solvent Usage

Operations, Property and/or Equipment Description:

Miscellaneous solvent cleaning and solvent wiping of plastic parts. Solvent-moistened Rags; Used Rag Containers.

- 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.

Table with 3 columns: Emissions Unit, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(D), OAC rule 3745-21-07(G), and 40 CFR Part 63, Subpart PPPP.

(2) Additional Terms and Conditions

- a. (P021) Miscellaneous Solvents on Plastic Parts The pound per day limitations for VOC is based upon the unit's potential to emit (PTE). Therefore there are no monitoring, record keeping, reporting or testing requirements associated with this limit.
- b. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:
 - i. Section c)(2);
 - ii. Section d)(2), recordkeeping requirements; and
 - iii. Section e)(2), reporting requirements.

[OAC rule 3745-21-07]

c) Operational Restrictions

- (1) The maximum material usage for this emissions unit shall not cause emissions of VOC to exceed 12.85 tons per rolling 12-month period, calculated according to the following formula:

$$[\text{Sum of all } (S) \times (OC)]/2000$$

Where:

S = usage of solvent material i, in gallons; and

OC = the organic compound content of material, in pounds per gallon.

- (2) The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- (3) As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall employ all applicable operating limits and work practice standards detailed in 63.4492 and 63.4493 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for the purpose of determining the annual volatile organic compound emissions, based upon a 12-month summation of the monthly emissions:



- a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The rolling, 12-monthly summation of the total VOC emissions, according to the formula in section c)(1), above.
- (2) The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:
- a. the name and identification number of each liquid organic material employed; and
 - b. whether or not the liquid organic material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- (3) As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall collect and keep all applicable records of the data and information detailed in 63.4530 of that subpart in the manner detailed in 63.4531 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

This deviation report shall be submitted according to the specific requirements of this permit.
 - (2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.
 - (3) As of the applicable compliance dates from 40 CFR Part 63, Subpart PPPP, the permittee shall submit all applicable reports and notifications detailed in 63.4510 and 63.4520 of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:



12.85 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of term d).

b. Emission Limitation:

The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart PPPP 63.4490 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:

As of the applicable compliance date from 40 CFR Part 63, Subpart PPPP, the permittee shall demonstrate compliance using the applicable methods detailed in 63.4540 through 63.4568 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in 63.4481 and 63.4482 of 40 CFR Part 63, Subpart PPPP.

g) Miscellaneous Requirements

(1) None.



22. P025, Injection Mold Machine #1

Operations, Property and/or Equipment Description:

Injection molding machine for plastic parts

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) b)(1)d., d)(3) thru (6), and e)(3).
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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include details for VOC emissions from mold agents, plastic pellets, and other units.

(2) Additional Terms and Conditions

a. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

- i. Section c)(3);
- ii. Section d)(6), recordkeeping requirements; and
- iii. Section e)(2), reporting requirements.

[OAC rule 3745-21-07]

b. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$\text{AER} = [(M1 \times \text{OCm1}) + (M2 \times \text{OCm2}) + \text{etc...}] / 2000 \text{ lbs/ton}$$

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

M = usage of mold agent or cleaning solvent, in gallons;

OCm = Volatile organic compound content of material, in pounds VOC per gallon; and

1,2, etc.. = individual materials employed and the specific OC content for each material employed.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

(2) The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

$$\text{AER} = (P \times \text{EF}) / 2000 \text{ lbs/ton}$$

Where:



AER = Annual Emission Rate, in ton per rolling 12-month period;

P = usage of plastic pellets employed, in pounds; and

EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

- (3) The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the company name and identification for each liquid organic material employed; and
- b. whether or not each liquid organic material employed is a photochemically reactive material.

- (2) The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:

- a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
- b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
- c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
- d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in c)(1). of this permit;
- e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;
- f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and
- g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

- (3) The PTI application for this emissions unit, P025, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$
 - d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1113.1

MAGLC (ug/m3): 2286

The permittee, has demonstrated that emissions of Cyclohexanone, from emissions unit P025, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

- (4) 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. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

- (5) 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 "Toxic 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 "Toxic 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 "Toxic 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

- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[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 information:
 - a. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined;
 - b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These deviation reports shall be submitted in accordance with the specific requirements of this permit.

- (2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air



Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

f) Testing Requirements

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

a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

HER = (PP)(PPv)(0.03*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)

Where:

HER = Hourly Emission Rate, in lbs/hr;

PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);

PPv = the VOC content of the plastic pellets, lb VOC/lb material;

MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);

MRv = the VOC content of the mold release, lbs VOC/gal;

MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);

MPv = the VOC content of the mold protectant, lbs VOC/gal;

MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MCv = the VOC content of the mold cleaner, lbs VOC/gal;

WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and

WSv = the VOC content of the wiping solvent, lbs VOC/gal



* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in d)(2), of this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in d)(2). of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.



23. P026, Injection Mold Machine #2

Operations, Property and/or Equipment Description:

Injection molding machine for plastic parts

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) b)(1)d., d)(3) thru (6), and e)(3).
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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include details for VOC emissions from mold agents, cleaning solvents, plastic pellets, and toxic rules.



(2) Additional Terms and Conditions

a. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

- i. Section c)(3);
ii. Section d)(6), recordkeeping requirements; and
iii. Section e)(2), reporting requirements.

[OAC rule 3745-21-07]

b. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

AER = [(M1 x OCm1) + (M2 x OCm2) + etc...] / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

M = usage of mold agent or cleaning solvent, in gallons;

OCm = Volatile organic compound content of material, in pounds VOC per gallon; and

1,2, etc.. = individual materials employed and the specific OC content for each material employed.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

(2) The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

AER = (P x EF) / 2000 lbs/ton

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

P = usage of plastic pellets employed, in pounds; and

EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

- (3) The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the company name and identification for each liquid organic material employed; and
- b. whether or not each liquid organic material employed is a photochemically reactive material.

- (2) The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:

- a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
- b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
- c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
- d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in c)(1). of this permit;
- e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;
- f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and
- g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

(3) The PTI application for this emissions unit, P025, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1113.1

MAGLC (ug/m3): 2286

The permittee, has demonstrated that emissions of Cyclohexanone, from emissions unit P025, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

- (4) 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. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

- (5) 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 "Toxic 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 "Toxic 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 "Toxic 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

- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[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 information:
 - a. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined;
 - b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These deviation reports shall be submitted in accordance with the specific requirements of this permit.

- (2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air



Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

f) Testing Requirements

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

a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

$$HER = (PP)(PPv)(0.03^*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)$$

Where:

HER = Hourly Emission Rate, in lbs/hr;

PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);

PPv = the VOC content of the plastic pellets, lb VOC/lb material;

MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);

MRv = the VOC content of the mold release, lbs VOC/gal;

MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);

MPv = the VOC content of the mold protectant, lbs VOC/gal;

MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MCv = the VOC content of the mold cleaner, lbs VOC/gal;

WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and

WSv = the VOC content of the wiping solvent, lbs VOC/gal



* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in d)(2), of this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in d)(2). of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.



24. P027, Injection Mold Machine #3

Operations, Property and/or Equipment Description:

Injection molding machine for plastic parts

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
(1) b)(1)d., d)(3) thru (6), and e)(3).
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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include details for VOC emissions from mold agents, cleaning solvents, plastic pellets, and toxic rules.

(2) Additional Terms and Conditions

a. 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

- i. Section c)(3);
- ii. Section d)(6), recordkeeping requirements; and
- iii. Section e)(2), reporting requirements.

[OAC rule 3745-21-07]

b. The hourly VOC emission limitation of 19.5 pounds was established to reflect potential to emit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

(1) The maximum annual VOC in mold agent and cleaning solvent material usage for emissions units P025, P026 and P027, combined, shall not exceed 4.82 tons of VOC per rolling 12-months, calculated using the following formula:

$$\text{AER} = [(M1 \times \text{OCm1}) + (M2 \times \text{OCm2}) + \text{etc...}] / 2000 \text{ lbs/ton}$$

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

M = usage of mold agent or cleaning solvent, in gallons;

OCm = Volatile organic compound content of material, in pounds VOC per gallon; and

1,2, etc.. = individual materials employed and the specific OC content for each material employed.

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

(2) The maximum annual plastic pellet material usage for emissions units P025, P026 and P027, combined, shall not cause emissions to exceed 3.56 tons of VOC per rolling, 12-months, calculated using the following formula:

$$\text{AER} = (P \times \text{EF}) / 2000 \text{ lbs/ton}$$

Where:

AER = Annual Emission Rate, in ton per rolling 12-month period;

P = usage of plastic pellets employed, in pounds; and

EF = 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

The permittee has sufficient existing records to demonstrate compliance with this limit during the first twelve months after issuance of this permit.

- (3) The use of any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the company name and identification for each liquid organic material employed; and
 - b. whether or not each liquid organic material employed is a photochemically reactive material.
- (2) The permittee shall maintain monthly records of the following information for emissions units P025, P026, and P027 combined:
- a. the company name and identification for each mold agent, cleaning solvent, and plastic pellet material employed;
 - b. the volume, in gallons, of each mold agent and cleaning solvent employed per rolling, 12-month summation;
 - c. the VOC content of each mold agent and cleaning solvent employed, in pounds per gallon;
 - d. the rolling 12-month summation of VOC emissions from the mold agents and cleaning solvents as calculated in c)(1). of this permit;
 - e. The weight, in tons, of plastic pellet material employed per rolling, 12-month summation;
 - f. the VOC content of the plastic pellet material employed, in pound(s) per pound; and
 - g. the rolling, 12-month summation of VOC emissions from the plastic pellet materials, i.e., the rolling 12-month summation of plastic pellet material usage rates (e.) multiplied by the plastic pellet material VOC content (f.), and then multiplied by the VOC emissions loss factor of 3% (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

- (3) The PTI application for this emissions unit, P025, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$
 - d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: Cyclohexanone

TLV (ug/m3): 96,000

Maximum Hourly Emission Rate (lbs/hr): 146.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1113.1

MAGLC (ug/m3): 2286

The permittee, has demonstrated that emissions of Cyclohexanone, from emissions unit P025, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

- (4) 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. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

- (5) 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 "Toxic 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 "Toxic 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 "Toxic 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

- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[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 information:
 - a. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 4.82 tons from the mold agents and cleaning solvents for emissions units P025, P026, and P027, combined;
 - b. any monthly record showing noncompliance with the rolling, 12-month VOC emission limitation of 3.56 tons from the plastic pellets for emissions units P025, P026 and P027, combined.

These deviation reports shall be submitted in accordance with the specific requirements of this permit.

- (2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to Ohio EPA, Southwest District Office within 30 days following the end of the calendar month during which the noncompliance occurred.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air

Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

f) Testing Requirements

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

a. Emission Limitation:

19.5 lbs VOC per hour for emission units P025, P026 and P027, combined

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation is demonstrated through the calculation as follows:

$$HER = (PP)(PPv)(0.03^*) + (MR)(MRv) + (MP)(MPv) + (MC)(MCv) + (WS)(WSv)$$

Where:

HER = Hourly Emission Rate, in lbs/hr;

PP = the maximum hourly plastic pellet usage, pounds (P025, P026 and P027, combined);

PPv = the VOC content of the plastic pellets, lb VOC/lb material;

MR = the maximum hourly mold release usage, gallons (P025, P026 and P027, combined);

MRv = the VOC content of the mold release, lbs VOC/gal;

MP = the maximum hourly mold protectant usage, gallons (P025, P026 and P027, combined);

MPv = the VOC content of the mold protectant, lbs VOC/gal;

MC = the maximum hourly mold cleaner usage, gallons (P025, P026 and P027, combined);

MCv = the VOC content of the mold cleaner, lbs VOC/gal;

WS = the maximum hourly wiping solvent usage, gallons (P025, P026 and P027, combined); and

WSv = the VOC content of the wiping solvent, lbs VOC/gal



* 3% loss factor (AP-42, "Compilation of Air Pollutant Emission Factors," 5th Ed. 1995).

b. Emission Limitations:

4.82 tons VOC from the mold agents and cleaning solvents per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation for the mold agents and cleaning solvents shall be determined through the record keeping requirements established in d)(2), of this permit.

c. Emission Limitations:

3.56 tons VOC from the plastic pellet material per rolling, 12-month summation for emissions units P025, P026 and P027, combined.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation from the plastic pellets material shall be determined through the record keeping requirements established in d)(2). of this permit.

(2) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.