☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **#01-7448**

A. Source Description

Honda of America Mfg, Inc. (Honda), located in Marysville, Ohio, is a facility that manufactures automobiles and motorcycles. In April 1996, Honda submitted a Title V application for the facility. Honda is requesting a permit to install for three emissions units that include the application of miscellaneous sealer, adhesives, paints, primers, corrosion protectants and lubricants to parts in Line 1 and Line 2 that are not accounted for by other permits.

B. Facility Emissions and Attainment Status

Honda is located in Union County which is considered attainment for all pollutants. Honda's potential to emit is much greater than 250 tons per year. Since the potential emissions are greater than 250 tons per year, the facility is considered major for PSD applicability. Honda has requested this PTI be issued with federally enforceable VOC limits to avoid triggering the significance rates for PSD.

C. Source Emissions

Honda is proposing federally enforceable VOC weight restrictions per rolling, 12-month period through use of a calculation formula included in the terms of the permit. The facility proposed the use of a weight restriction, as opposed to a gallons restriction, because several coatings with vastly different VOC contents may be used in each emissions unit. Record keeping requirements for each material's usage and records of the VOC content of each coating and the calculated emissions shall demonstrate compliance with the rolling, 12-month limits contained in the permit. The permit also restricts the VOC content of each coating based on BAT or OAC rule 3745-21-09(U).

D. Conclusion

Honda has requested that this PTI be issued as a Synthetic Minor with federally enforceable VOC weight restrictions based on a rolling, 12-month basis. Each emissions unit is restricted to less than 5 tons VOC/rolling, 12-month period to be tracked by material usage and VOC content by weight.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
UNION COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 01-07448

DATE: 6/22/2004

Honda of America Mfg., Inc.
Joanna Bambeck
24000 Honda Parkway
Marysville, OH 43040-9190

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install Terms and Conditions

Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 01-07448

Application Number:	01-07448
APS Premise Number:	0180000130
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Honda of America Mfg., Inc.
Person to Contact:	Joanna Bambeck
Address:	24000 Honda Parkway Marysville, OH 43040-9190

Location of proposed air contaminant source(s) [emissions unit(s)]:
24000 Honda Parkway
Marysville, Ohio

Description of proposed emissions unit(s):
Manual application of miscellaneous sealers and adhesives.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. 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. 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. 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.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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:

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

ii. 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.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

3. 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.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	10.9

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K224 - Miscellaneous application of sealers and adhesives to metal and non-metal parts on Lines 1 and 2	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 3.5 pounds/gallon, excluding water and exempt solids. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-09(U)(1)(d)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See A.I.2.a below.
	OAC rule 3745-21-07(G)	See A.I.2.b below.
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 4.3 tons per rolling, 12-month period. See A.I.2.c below.

2. Additional Terms and Conditions

2.a The coatings employed in this emissions unit are dried at temperatures not exceeding two hundred degrees Fahrenheit.

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

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

2.c The maximum sealer and adhesive coating usage shall not exceed 4.3 tons of VOC per rolling 12 months, calculated using the following formula:

$$4.3 \text{ tons VOC*} = < \sum_{i=1}^{n} \frac{(P_i)x(VOC_{pi})}{2000}$$

where:

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

*coating usage is equivalent to mass emissions based upon 100% of the solvents in the coating materials being emitted.

2.d To ensure federal enforceability during the first 12 calendar months of this permit, actual VOC emissions calculated from coating material usage records (this calculation is based upon 100% of the solvents in the coating materials employed being emitted) from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.

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

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

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

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

b. documentation showing that the material is non-photochemically reactive if applied to non-metal;

c. the VOC content of each material, as applied;

d. the number of gallons of each material, as applied;

e. the total VOC emission rate from all materials applied, in pounds per month;

f. the 12-month rolling material coating usage amounts, in tons per year.

2. For the purpose of determining compliance with the rolling, 12-month emission limitation, the permittee shall collect and record the rolling, 12-month summation of VOC emissions from the adhesives and sealers using the calculation provided in Section A.I.2.c above and the record keeping requirements in Section A.III.1.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.5 lbs VOC/gal, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) that identify any exceedance of either of the 4.3 tons per rolling, 12-month coating usage and/or VOC mass emission limitations.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when a photochemically reactive material or material not exempt under 3745-21-07(G)(9) is applied to non-metal in this emissions unit.

4. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA, Central District Office in accordance with Part I, Section A.1.c. of the General Terms and Conditions.

5. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15, 2004. This reporting requirement may be meet by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

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

   Applicable Compliance Method:

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

b. Coating Usage Limitation:
Coating Usage shall not exceed 4.3 tons per rolling, 12-month period.

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

c. Emissions Limitation:

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

Applicable Compliance Method:
Compliance with this limit may be determined through the rolling, 12-month records required in Section III.2 above. The rolling, 12-month emissions from the emissions unit may be calculated by adding the current monthly emissions to the summation of emissions for the previous 11 months.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K224 - Miscellaneous application of sealers and adhesives to metal and non-metal parts on Lines 1 and 2	Ohio Air Toxic Policy	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for emissions unit K224 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

   Pollutant: Toluene
   TLV (mg/m3): 188
   Maximum Hourly Emission Rate (lbs/hr): 2.0
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1142.6
   MAGLC (ug/m3): 4476

   Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air

Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K225 - Miscellaneous application of corrosion protectants and lubricants on Lines 1 and 2	OAC rule 3745-31-05(A)(3)	The organic compound (OC) content of the materials employed in this emissions unit shall not exceed 6.5 pounds OC per gallon when coating non-metal. The volatile organic compound (VOC) content of the materials employed in this emissions unit shall not exceed 3.5 pounds VOC per gallon, excluding water and exempt solvents, when coating metal. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-09(U)(d)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See A.I.2.a below.
	OAC rule 3745-21-07(G)	See A.I.2.b below.
	OAC rule 3745-31-05(C)	VOC/OC emissions shall not exceed 4.8 tons per rolling, 12-month period. See A.I.2.c below.

2. Additional Terms and Conditions

2.a The coatings employed in this emissions unit are dried at temperatures not exceeding two hundred degrees Fahrenheit.

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

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

2.c The maximum corrosion protectant and lubricant usage shall not exceed 4.8 tons of VOC per rolling 12 months, calculated using the following formula:

$$4.8 \text{ tons VOC /OC*} \leq \sum_{i=1}^{n} \frac{(P_i)x(VOC_{pi})}{2000}$$

where:

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

*corrosion protectant and lubricant usage is equivalent to mass emissions based upon 100% of the solvents in the coating materials being emitted.

2.d To ensure federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from material usage records (this calculation is based upon 100% of the solvents in the materials employed being emitted) from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

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

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

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

c. the number of gallons of each material, as applied;

d. the total VOC emission rate from all materials applied, in pounds per month; and

e. the 12-month rolling material usage amount, in tons per year.

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

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

b. documentation showing that the material is non-photochemically reactive;

c. the OC content of each material, as applied;

d. the number of gallons of each material, as applied;

e. the total OC emission rate from all materials applied, in pounds per month; and

f. the 12-month rolling material usage amount, in tons per year.

3. For the purpose of determining compliance with the rolling, 12-month emission limitation, the permittee shall collect and record the rolling, 12-month summation of VOC/OC emissions from the corrosion protectants and lubricants materials employed using the calculation provided in Section A.I.2.c above and the record keeping requirements listed in appropriate terms A.II.1 and 2.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the coating content limitation of 3.5 lbs VOC/gal, excluding water and exempt solvents, when applied to metal. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record

showing an exceedance of the coating content limit of 6.5 lbs OC/ gallon when applied to non-metal.

3. The permittee shall submit quarterly deviation (excursion) that identify any exceedance of either of the 4.8 tons per rolling, 12-month VOC/OC coating usage and/or mass emissions limitations.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when a photochemically reactive material or material not exempt under 3745-21-07(G)(9) is applied to non-metal in this emissions unit.

5. All quarterly deviation reports shall be submitted to the Ohio EPA, Central District Office as required in the General Terms and Conditions of this permit, Part 1, Section A.1.c.

6. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15, 2004. This reporting requirement may be meet by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.

V. Testing Requirements

1. Compliance with the usage and emission limitations in Section A.I.1of these terms and conditions shall be determined in accordance with the following methods:

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

   Applicable Compliance Method:
   Compliance with the OC content limit may be determined through monthly record keeping specified in Section III.2. above. Formulation data from the manufacturer of the corrosion protectant or lubricant or US EPA Method 24 shall be used to determine the VOC content.

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

   Applicable Compliance Method:
   Compliance with the VOC content limit may be determined through monthly Record keeping specified in Section III.1above. Formulation data from the manufacturer of the corrosion protectant or lubricant or US EPA Method 24 shall be used to determine the VOC content.

   c. Coating Usage Limitation:
   Coating usage shall not exceed 4.8 tons per rolling, 12-month period.

Applicable Compliance Method:
Compliance with this limit may be determined through the rolling, 12-month records required in Section III.2 above. The rolling, 12-month coating usage from the emissions unit may be calculated by adding the current monthly coating usage to the summation of coating usage for the previous 11 months.

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

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

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K225 - Miscellaneous application of corrosion protectants and lubricants, on Lines 1 and 2	Ohio Air Toxic Policy	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC rule 3745-31 requires permittees to apply for and obtain a

new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K226 - Miscellaneous application of paints and primers, to metal and non-metal parts, on Lines 1 and 2	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.6 pounds per gallon, excluding water and exempt solvents. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-31-05(C)	VOC emissions shall not exceed 1.8 ton per rolling, 12-month period. See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hour and 40 lbs/day when using photochemically reactive cleanup materials or applying photochemically reactive materials to non-metal.
	OAC rule 3745-21-09(U)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a The maximum coating and cleanup material usage shall not exceed 1.8 ton of VOC per rolling, 12-months, calculated using the following formula:

$$1.8 \text{ ton VOC*} \leq \sum_{i=1}^{n} \frac{(P_i)x(VOC_{pi})}{2000}$$

where:

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

*coating and cleanup materials usage is equivalent to mass emissions based upon 100% of the solvents in the coating and cleanup materials being emitted.

2.b Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the limits specified in OAC rule 3745-21-09(U) because the emission unit's maximum daily coating usage is less than ten gallons per day.

2.c To ensure the federal enforceability during the first 12 calendar months of this permit, actual emissions calculated from the material usage records (this calculation is based upon 100% of the solvents in the coating materials employed being emitted) from the previous 11 calendar months of operation shall be used to calculate the rolling, 12-month emissions.

II. Operational Restrictions

1. The permittee shall not use more than 10 gallons of coating per day in this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. When coating non-metal parts, the permittee shall collect and record the following information each day for the coating line:

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

   b. the volume, in gallons, of each coating employed; and

   c. the total volume, in gallons, of all of the coatings employed.

2. When coating non-metal parts, the permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and photochemically reactive cleanup material employed;

b. the number of gallons of each coating and photochemically reactive cleanup material, in pounds per gallon;

c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. for each day during which a photochemically reactive material (coating or cleanup material) is employed; the total number of hours the emissions unit was in operation; and

f. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e. (d)/(e), in pounds per hour (average).

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

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

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

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

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

e. the 12-month rolling coating and cleanup material usage amounts, in tons per year.

4. When coating metal parts, the permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the VOC content of each coating, as applied, in pounds per gallon; and

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

5. For the purpose of determining compliance with the rolling, 12-month emission limitation, the permittee shall collect and record the rolling, 12-month summation of VOC emissions from the coatings employed using the calculation provided in Section A.I.2.a above and the record keeping requirements listed in appropriate terms A.II.1, 2, 3, and 4.

IV. Reporting Requirements

1. The permittee shall notify the Central District Office in writing of any daily record showing that the ten gallon coating limit was exceeded for this emissions unit. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. for the days during which a photochemically reactive cleanup material was employed and/or a photochemically reactive coating was applied to non-metal, an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

   b. for the days during which a photochemically reactive cleanup material was employed and/or a photochemically reactive coating was applied to non-metal, an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) that identify any exceedance of either of the 1.8 tons per rolling, 12-month VOC/OC coating and cleanup materials usage and/or VOC/OC mass emission limitations.

4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

5. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year by April 15, 2004. This reporting requirement may be meet by including this emissions unit in the annual Fee Emissions Report that is due on April 15 of each year.

V. Testing Requirements

1. Compliance with the emission and usage limitations in Section A.I.1 and 2of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The VOC content of the coating shall not exceed 6.6 lbs/gal, excluding water and exempt

solvents.

Applicable Compliance Method:
Compliance with the VOC content limit may be determined through monthly record keeping specified in Section III.2 above. Formulation data from the manufacturer of the corrosion protectant or lubricant or US EPA Method 24 shall be used to determine the VOC content.

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

Applicable Compliance Method:
Compliance with the hourly and daily OC limits shall be determined through daily Record keeping as specified in A.III.3. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

c. Usage Limitation:
Coating and clean up materials usage shall not exceed 1.8 ton per rolling, 12-month period.

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

d. Emission Limitation:
VOC emissions shall not exceed 1.8 ton per rolling, 12-month period.

Applicable Compliance Method:
Compliance with this limit may be determined through the rolling, 12-month records required in Section A.III.5 above. The rolling, 12-month emissions from the emissions unit may be calculated by adding the current monthly emissions to the summation of emissions for the previous 11 months.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K226 - Miscellaneous application of paints and primers, to metal and non-metal parts, on Lines 1 and 2	Ohio Air Toxic Policy	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permit to install for emissions unit K226 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

   Pollutant: Propionic Acid
   TLV (mg/m3): 30
   Maximum Hourly Emission Rate (lbs/hr): 0.35

Emissions Unit ID: K226

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 199.96
MAGLC (ug/m3): 714

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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 compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

2. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None