State of Ohio Environmental Protection Agency

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

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
UNION COUNTY
Application No: 01-08167
Fac ID: 0180000130
DATE: 2/22/2005

Honda of America Mfg., Inc.
Stephen Fogle
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 modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **$ 200** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 01-08167

Application Number:	01-08167
Facility ID:	0180000130
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Honda of America Mfg., Inc.
Person to Contact:	Stephen Fogle
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):
Plastics primer painting system.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the 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 obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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
OC	118.01
PM	10.82
SO_2	0.09
NOx	14.31
CO	12.02

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
P307 - POPA Paint Effluent System, existing system (Modification)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) content of OC-containing water treatment materials, used in the POPA paint effluent systems, shall not exceed 2.64 lb/gal as a monthly volume-weighted average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C).
	OAC rule 3745-21-07(G)	Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9), see Section A.I.2.b below.
	OAC rule 3745-31-05 (C)	Organic compound emissions from the POPA paint effluent systems, emission units P307 and P340, shall not exceed 10.22 tons per rolling 12 months; and see Section A.I.2.a below.

2. Additional Terms and Conditions

2.a To ensure federal enforceability during the first 12 months of this permit, the calculated OC emissions from the addition of OC containing materials to the two POPA paint

effluent systems together (emission units P307 and P340) shall not exceed the calculated emissions, through each month, as defined in the following table:

Month	OC Emissions (lbs)
1	1,703
1-2	3,407
1-3	5,110
1-4	6,813
1-5	8,517
1-6	10,220
1-7	11,923
1-8	13,626
1-9	15,330
1-10	17,033
1-11	18,736
1-12	20,440

2.b This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for P307 and P340:

   a. the company identification for each material added to the paint effluent systems, for the purpose of paint overspray flocculation and removal, algae/bacterial control, and water treatment;

   b. the number of gallons of each OC-containing material added to the paint effluent systems;

   c. the OC content of each OC-containing material added to the paint effluent systems, in pounds per gallon;

   d. the monthly volume-weighted average OC content of all OC-containing materials added to the paint effluent systems, calculated as specified in Section A.V.2; and

   e. the total OC emissions from all OC-containing materials added to the POPA paint effluent systems, in tons per rolling 12-month period.

2. The company identification of each OC-containing material added to the paint effluent system and documentation to show each to be non-photochemically reactive.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any calculated exceedance of the rolling, 12-month OC emissions from the OC-containing materials added the POPA paint effluent systems. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

2. The permittee shall submit deviation (excursion) reports which identify any record showing the addition of a photochemically reactive material or material not exempt under 3745-21-07(G)(9) to the POPA paint effluent systems. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

3. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing that the monthly volume-weighted average OC content of OC-containing materials, used in the POPA paint effluent systems, exceeded 2.64 pound of OC per gallon. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

4. The permittee shall submit annual reports which specify the total emissions of organic compounds from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. <u>Emission Limitation</u>

10.22 tons OC/rolling 12 months from both POPA paint effluent systems

<u>Applicable Compliance Method</u>

Compliance with this limit shall be determined through maintaining monthly records of the name of materials added to the paint effluent systems , the amount of each organic material added, and the OC content of each material. Formulation data from the manufacturer or USEPA Method 24 shall be used to determine the OC content of each material. Emissions shall be calculated as follows:

Maximum OC emissions = ∑ OC content of each material (lbs/gal) X the amount of each material

used each month (gal), plus the same calculation of emissions from the previous 11 months.

For the first 12 calendar months of operation after the issuance of this permit, compliance shall be demonstrated by documenting emissions do not exceed the levels contained in the table in Section A.I.2.a of the Additional Terms & Conditions.

2. Emission Limitation

2.64 lb VOC/gallon of material, added to the POPA paint effluent systems as a monthly volume-weighted average

Applicable Compliance Method

Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping, as specified in Section A.III.1. Formulation data from each material's manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. The monthly volume-weighted average shall be calculated for each month's usage as follows:

mo. volume weighted average = the summation of all materials i through z, calculated as: [(lbs OC/gal of material i) x (gal of material i/gal of all OC containing materials)] + ... + [(lbs OC/gal of material z) x (gal of material z/gal of all OC containing materials)]

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
P307 - POPA Paint Effluent System, existing system Modification)		Compliance with Ohio Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P307 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 only pollutant exceeding 1 ton per year:

Pollutant: Petroleum distillate

TLV: VM & P Naphtha 1,370 mg/m3; Stoddard solvent 573 mg/m3; Gasoline 890mg/m3

Maximum Hourly Emission Rate: 2.41 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 0.086 mg/m3

MAGLC: 13.63 mg/m3 for Stoddard solvent

2. 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 still 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 (typically for coatings or cleanup materials), 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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

This Permit to Install (01-08167) supercedes and replaces PTI #01-6645 issued 12/8/99.

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
P340 - POPA Paint Effluent System, new system (Modification)	OAC rule 3745-31-05(A)(3)	The organic compound (OC) content of OC-containing water treatment materials, used in the POPA paint effluent systems, shall not exceed 2.64 lb/gal as a monthly volume-weighted average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C).
	OAC rule 3745-21-07(G)	Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9), see Section A.I.2.b below.
	OAC rule 3745-31-05 (C)	Organic compound emissions from the POPA paint effluent systems, emission units P307 and P340, shall not exceed 10.22 tons per rolling 12 months; and see Section A.I.2.a below.

2. Additional Terms and Conditions

2.a To ensure federal enforceability during the first 12 months of this permit, the calculated OC emissions from the addition of OC containing materials to the two POPA paint effluent systems together (emission units P307 and P340) shall not exceed

the calculated emissions, through each month, as defined in the following table:

Month	OC Emissions (lbs)
1	1,703
1-2	3,407
1-3	5,110
1-4	6,813
1-5	8,517
1-6	10,220
1-7	11,923
1-8	13,626
1-9	15,330
1-10	17,033
1-11	18,736
1-12	20,440

2.b This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for P307 and P340:

   a. the company identification for each material added to the paint effluent systems, for the purpose of paint overspray flocculation and removal, algae/bacterial control, and water treatment;

   b. the number of gallons of each OC-containing material added to the paint effluent systems;

   c. the OC content of each OC-containing material added to the paint effluent systems, in pounds per gallon; and

   d. the monthly volume-weighted average OC content of all OC-containing materials added to the paint effluent systems, calculated as specified in Section A.V.2; and

   e. the total OC emissions from all OC-containing materials added to the POPA paint effluent systems, in tons per rolling 12-month period.

2. The company identification of each OC-containing material added to the paint effluent system and documentation to show each to be non-photochemically reactive.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any calculated exceedance of the rolling 12-month OC emissions from the OC-containing materials added the POPA paint effluent systems. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

2. The permittee shall submit deviation (excursion) reports which identify any record showing the addition of a photochemically reactive material or material not exempt under 3745-21-07(G)(9) to the POPA paint effluent systems. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

3. The permittee shall notify the Ohio EPA Central District Office, in writing, of any monthly record showing that the monthly, volume-weighted average OC content of OC-containing materials, used in the POPA paint effluent systems, exceeded 2.64 pound of OC per gallon. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

4. The permittee shall submit annual reports which specify the total emissions of organic compounds from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. <u>Emission Limitation</u>

   10.22 tons OC/rolling 12 months from both POPA paint effluent systems

   <u>Applicable Compliance Method</u>

   Compliance with this limit shall be determined through maintaining monthly records of the name of materials added to the paint effluent systems , the amount of each organic material added, and the OC content of each material. Formulation data from the manufacturer or USEPA Method 24 shall be used to determine the OC content of each material. Emissions shall be calculated as

follows:

Maximum OC emissions = ∑ OC content of each material (lbs/gal) X the amount of each material used each month (gal), plus the same calculation of emissions from the previous 11 months.

For the first 12 calendar months of operation after the issuance of this permit, compliance shall be demonstrated by documenting emissions do not exceed the levels contained in the table in Section A.I.2.a of the Additional Terms & Conditions.

2. Emission Limitation

2.64 lb VOC/gallon of material, added to the POPA paint effluent systems as a monthly volume-weighted average

Applicable Compliance Method

Compliance with this volume-weighted average limit shall be determined through monthly recordkeeping, as specified in Section A.III.1. Formulation data from each material's manufacturer or USEPA Method 24 shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. The monthly volume-weighted average shall be calculated for each month's usage as follows:

mo. volume weighted average = the summation of all materials i through z, calculated as: [(lbs OC/gal of material i) x (gal of material i/gal of all OC containing materials)] + ... + [(lbs OC/gal of material z) x (gal of material z/gal of all OC containing materials)]

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
P340 - POPA Paint Effluent System, new system (Modification)		Compliance with Ohio Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P340 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 only pollutant exceeding 1 ton per year:

   Pollutant: Petroleum distillate

   TLV: VM & P Naphtha 1,370 mg/m3; Stoddard solvent 573 mg/m3; Gasoline 890mg/m3

   Maximum Hourly Emission Rate: 1.62 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 0.083 mg/m3

MAGLC: 13.63 mg/m3 for Stoddard solvent

2. 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 still 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 (typically for coatings or cleanup materials), 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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	
R200 - Primer Booth for POPA plastic parts coating lines, with infrared oven, natural gas oven, and/or dehumidification system (Modification)	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-21-07(G)
		OAC rule 3745-31-05 (C)
		OAC rule 3745-17-07(A)(1)

	Applicable Emissions Limitations/Control Measures	
		0.79 ton OC/yr; 0.02 lb SO_2/hr; 0.09 ton SO_2/yr
OAC rule 3745-17-11(B)(1)	Organic compound (OC) emissions from the application and drying of waterborne primer coatings in the primer booth shall not exceed 17.44 lbs/hr. OC emissions from the application and drying of solvent-based repaint primer shall not exceed 183.46 lbs/hr. See Section A.2.b below. Particulate emissions (PE) from the overspray of POPA coatings shall not exceed 10.82 tons per year from emission units R200 and R201. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05 (C). Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed: 3.86 lbs NOx/hr; 14.31 tons NOx/yr; 3.25 lbs CO/hr; 12.02 tons CO/yr; 0.07 lb filterable PE/hr; 0.27 ton filterable PE/yr; 0.21 lb OC/hr;	Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9), see Section A.I.2.a below. Organic compound emissions from coatings, solvent, and cleanup/purge materials usage shall not exceed 107 tons per rolling 12 months from emission units R200 and R201. see Section A.II.2. below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule. Particulate emissions from overspray in R200 shall not exceed 0.98 lb/hr.

2. Additional Terms and Conditions

2.a This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).

2.b The hourly OC emission limitations were established to reflect the potential to emit for each type of coating employed in this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping, and reporting requirements to ensure compliance with these emission limitations.

2.c The use of all solvent-based repaint primer is not typical operation for this emissions unit. However, in some cases it may be necessary to temporarily coat with all solvent-based repaint primer in order to maintain production.

II. Operational Restrictions

1. The permittee shall operate the downdraft air system whenever a spray coating is applied in this emissions unit

2. The maximum emissions from coating, solvent, and cleanup/purge usage for emissions units R200 and R201 combined shall not exceed 107 tons of OC per rolling, 12-month period, calculated using the following formula.

$$107 \text{ TPY of OC} \geq (1 - DRE)(CE)(RE) \times \frac{\{\sum (OCi)(Ui) - \text{Recovery Credit}\}}{2000 \text{ lbs/ton}}$$

where,
DRE = destruction removal efficiency of the incinerator
RE = removal efficiency of the concentrator
CE = capture efficiency of the concentrator
OCi = organic compound content (lb/gal) of coating i, solvent i, and purge/cleanup i
Ui = usage (gallons) of coating i, solvent i, and purge/cleanup i
Recovery Credit = pounds of solvent recovered from purge solvent recovery

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for the POPA coating operations (R200 and R201):

a. the company identification for each coating, solvent, and cleanup/purge material

employed;

b. the number of gallons of each coating, solvent, and cleanup/purge material employed;

c. the organic compound content of each coating, solvent, and cleanup/purge material, in pounds per gallon;

d. the total organic compound emissions for all coatings, solvent, and cleanup/purge materials, prior to any credit for recovered materials, in pounds or tons per month;

e. if a credit for recovered materials is used, the total OC/VOC emissions from recovered materials to be credited against the total OC/VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (from Section A.III.2.e below);

f. if a credit for recovered materials is used, the adjusted total OC/VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (i.e., (d) - (e));

g. the rolling 12-month total OC emissions from the coatings, solvent, and purge/cleanup materials employed in the POPA coating operations, including emissions units R200 and R201

2. If a credit for recovered materials is used in Section A.III.1 above, the permittee shall maintain the following records for the recovered materials and the recovery tank(s) serving emissions units R200 and R201:

a. the date the material is removed from the POPA recovery tank(s);

b. the date the materials from the POPA recovery tank(s) were shipped off site;

c. the number of gallons of materials from the POPA recovery tank(s) shipped off site;

d. the OC/VOC content of the materials from the POPA recovery tank(s), in pounds per gallon; and

e. the total OC/VOC emissions from recovered materials to be credited against the total OC/VOC emissions from all coatings, solvent, and purge and cleanup materials employed, in pounds or tons.

3. The permittee shall maintain records that document any time periods when the downdraft air system was not in service when a spray coating was applied in this emissions unit .

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any record showing the application of a photochemically reactive material or material not exempt under 3745-21-07(G)(9) in this emission unit. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the downdraft air system was not in service when spray coating was applied in this emissions unit. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

3. The permittee shall submit annual reports which specify the total emissions of particulates and organic compounds from this emissions unit for the previous calendar year. The reports shall be

submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit deviation reports which identify any record of an exceedance of the 12-month rolling OC emission limitation . These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

V. Testing Requirements

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

   Emission Limitation
   Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

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

2. Emission Limitation
   107 tons of VOC per rolling 12 months from R200 and R201 combined

   Applicable Compliance Method
   Compliance with this emission limitation may be determined by the record keeping specified in Section A.III.1.g above. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of coatings, reducing solvents, cleanup and purge materials.

3. Emission Limitation
   17.44 lbs of OC per hour from waterborne primer coatings
   183.46 lbs of OC per hour from solvent-based repaint primer coatings

   Applicable Compliance Method
   The hourly OC limitations were established by multiplying the maximum hourly coating usage for each material (9.95 gallons of waterborne primer and 30.1 gallons of solvent-based repaint primer) by the maximum OC content for each material (1.2 lbs OC/gal for waterborne primer and 6.08 lbs OC/gal for solvent-based repaint primer).

4. Emission Limitations
   Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:

3.86 lbs NOx/hr;
14.31 tons NOx/yr;
3.25 lbs CO/hr;
12.02 tons CO/yr;
0.07 lb filterable PE/hr;
0.27 ton filterable PE/yr;
0.21 lb OC/hr;
0.79 ton OC/yr;
0.02 lb SO_2/hr;
0.09 ton SO_2/yr

Applicable Compliance Method
These limits represent the maximum capacity of the burners of all the drying ovens, the air supply units, the concentrator(s), and the RTO for the POPA operations. These emission limitations were determined by multiplying the maximum natural gas usage from all these burners (38,635 ft^3/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft^3) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The RTO burners shall be fueled by the organic compounds, for which they were installed to control; and it is estimated that it shall require no more than 50 hours of natural gas fuel to begin combustion. Other than the RTO burners, the remaining hourly natural gas usage was multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

5. Emissions Limit
0.98 lb PE/hr from overspray in the primer booth;

PE from the overspray of coatings shall not exceed 10.82 tons per year from emission units R200 and R201

Compliance Method
Compliance with the hourly limit shall be based on meeting the requirements for the downdraft air system found in Sections A.II.1, A.III.3, and A.IV.2 of Part III. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

Compliance with the annual limit shall be based on meeting the requirements for the downdraft air systems specified under Sections A. II. , A.III , and A.IV. of Part III for emissions units R200 and R201, and submitting annual reports or Fee Emission Reports with the calculated emissions of particulate matter, derived from material usage records, at the end of each year.

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
R200 - Primer Booth for POPA plastic parts coating lines, with infrared oven, natural gas oven, and/or dehumidification system (Modification)		Compliance with Ohio Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "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" pollutant:

Pollutant: Toluene

TLV: 188.4 mg/m^3

Maximum Hourly Emission Rate: 183.46 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 3,445 mg/m^3

MAGLC: 4,486 mg/m^3

2. 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 (typically for coatings or cleanup materials), 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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

This Permit to Install (01-08167) replaces the requirements for the operations of emissions unit R301 in the PTI numbered 01-0999 issued 2/8/89, upon the startup of these coating operations.

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	
R201 -	OAC rule 3745-31-05(A)(3)	
POPA topcoat process with coating booths, natural gas-fired air supply, oven, concentrator and RTO control (Modification)		OAC rule 3745-21-07(G)
		OAC rule 3745-31-05 (C)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)(1)

Applicable Emissions Limitations/Control Measures	
Organic compound (OC) emissions from the application and drying of coatings in shall not exceed 33.76 lbs/hr. Particulate emissions (PE) from the overspray of POPA coatings shall not exceed 10.82 tons per year from emission units R200 and R201. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(C). Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed: 3.86 lbs NOx/hr; 14.31 tons NOx/yr; 3.25 lbs CO/hr; 12.02 tons CO/yr; 0.07 lb filterable PE/hr; 0.27 ton filterable PE/yr; 0.21 lb OC/hr;	0.79 ton OC/yr; 0.02 lb SO_2/hr; 0.09 ton SO_2/yr Exempt from the limitations in 3745-21-07(G)(2) by using only non-photochemically reactive materials or material exempt under 3745-21-07(G)(9), see Section A.I.2.a below. Organic compound emissions from the application and drying of coatings, and from the cleanup, and purge materials usage shall not exceed 107 tons per rolling 12 months from emission units R200 and R201. see Section A.II.2. below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule. Particulate emissions from overspray in R201 shall not exceed 1.49 lb/hr.

2. Additional Terms and Conditions

2.a This emissions unit shall use only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), or materials exempt per OAC 3745-21-07(G)(9).

II. Operational Restrictions

1. The OC emissions from this emissions unit shall be collected by a concentrator and vented to a regenerative thermal oxidizer (RTO), which together shall reduce OC emissions from these coating operations by an estimated 83.9% based on emissions testing conducted December 17 and 18, 2002). The 83.9% OC reductionestimate shall be used to calculate emissions and demonstrate compliance with the limits contained in this permit.

2. The maximum emissions from coating, solvent, and cleanup/purge usage for emissions units R200 and R201 combined shall not exceed 107 tons of OC per rolling, 12-month period, calculated using the following formula.

$$107 \text{ TPY of OC} \geq (1 - DRE)(CE)(RE) \times \frac{\{\sum (OCi)(Ui) - \text{Recovery Credit}\}}{2000 \text{ lbs/ton}}$$

where,
DRE = destruction removal efficiency of the incinerator
RE = removal efficiency of the concentrator
CE = capture efficiency of the concentrator
OCi = organic compound content (lb/gal) of coating i, solvent i, and purge/cleanup i
Ui = usage (gallons) of coating i, solvent i, and purge/cleanup i
Recovery Credit = pounds of solvent recovered from purge solvent recovery

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

3. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, or below 1200 degrees Fahrenheit until such time of testing.

4. The permittee shall operate the downdraft air system whenever a spray coating is applied in this emissions unit

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for emissions units R200 and R201:

a. the company identification for each coating, solvent, and cleanup/purge material employed;

b. the number of gallons of each coating, solvent, and cleanup/purge material employed;

c. the organic compound content of each coating, solvent, and cleanup/purge material, in pounds per gallon;

d. the total organic compound emissions for all coatings, solvent, and cleanup/purge materials, prior to any credit for recovered materials, in pounds or tons per month;

e. if a credit for recovered materials is used, the total OC/VOC emissions from recovered materials to be credited against the total OC/VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (from Section A.III.2.e below);

f. if a credit for recovered materials is used, the adjusted total OC/VOC emissions from all coatings, solvent, and purge/cleanup materials employed, in pounds or tons (i.e., (d) - (e));

g. the controlled net OC emissions from all coatings, coating components, and cleanup/purge materials employed, in pounds or tons per month (estimated at 83.9% based on emissions testing conducted December 17 and 18, 2002);

h. the rolling 12-month total OC emissions from the coatings, solvent, and purge/cleanup materials employed in the POPA coating operations, including emissions units R200 and R201

2. If a credit for recovered materials is used in Section A.III.1 above, the permittee shall maintain the following records for the recovered materials and the recovery tank(s) serving emissions units R200 and R201:

a. the date the material is removed from the POPA recovery tank(s);

b. the date the materials from the POPA recovery tank(s) were shipped off site;

c. the number of gallons of materials from the POPA recovery tank(s) shipped off site;

d. the OC/VOC content of the materials from the POPA recovery tank(s), in pounds per gallon; and

e. the total OC/VOC emissions from recovered materials to be credited against the total OC/VOC emissions from all coatings, solvent, and purge and cleanup materials employed, in pounds or tons.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. 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.

4. The permittee shall collect and record the following information each day for the control equipment:

a for the RTO and concentrator, a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and

b. all 3-hour blocks of time during which the average combustion temperatures within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit

below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance, or below 1200 degrees Fahrenheit until such time of testing.

5. The permittee shall maintain records that document any time periods when the downdraft air system was not in service when a spray coating was applied in this emissions unit .

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any record showing the application of a photochemically reactive material or material not exempt under 3745-21-07(G)(9) in this emission unit. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the RTO does not comply with the temperature limitation specified above. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

3. The permittee shall submit quarterly deviation (excursion) reports that identify any record showing that the downdraft air system was not in service when spray coating was applied in this emissions unit. These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

4. The permittee shall submit annual reports which specify the total emissions of particulates and organic compounds from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

5. The permittee shall submit deviation reports which identify any record of an exceedance of the 12-month, rolling OC emission limitation . These reports shall be submitted quarterly, as required in the General Terms and Conditions, Part I, Section A.1.c.ii.

V. Testing Requirements

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

   <u>Emission Limitation</u>
   Visible particulate emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule

   <u>Applicable Compliance Method</u>
   If required, compliance shall be determined through visible emissions observations performed in

accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. Emission Limitation
107 tons of VOC per rolling 12 months from R200 and R201 combined

Applicable Compliance Method
Compliance with this emission limitation may be determined by the record keeping specified in Section A.III.1.g above. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of coatings, reducing solvents, cleanup and purge materials.

3. Emission Limitations
Emissions from all natural gas usage for the POPA plastic parts coating lines, including all drying ovens, air supply units, the concentrator(s), and the RTO for emissions units R200 and R201 shall not exceed:

3.86 lbs NOx/hr;
14.31 tons NOx/yr;
3.25 lbs CO/hr;
12.02 tons CO/yr;
0.07 lb filterable PE/hr;
0.27 ton filterable PE/yr;
0.21 lb OC/hr;
0.79 ton OC/yr;
0.02 lb SO_2/hr;
0.09 ton SO_2/yr

Applicable Compliance Method
These limits represent the maximum capacity of the burners of all the drying ovens, the air supply units, the concentrator(s), and the RTO for the POPA operations. These emission limitations were determined by multiplying the maximum natural gas usage from all these burners (38,635 ft^3/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft^3) found in "Compilation of Air Pollutant Emission Factors", the 7/98 edition of AP-42, Tables 1.4-1, and 1.4-2. The RTO burners shall be fueled by the organic compounds, for which they were installed to control; and it is estimated that they shall require no more than 50 hours of natural gas fuel to begin combustion. Other than the RTO burners, the remaining hourly natural gas usage was multiplied by 8760 hours per year and divided by 2000 pounds per ton, to obtain the potential emissions of the burners. Since these limits reflect the potential emissions of the burners, no additional compliance determination is required.

4. Emissions Limit
1.49 lb particulate emissions/hr from overspray in R201 ;

PE from the overspray of coatings shall not exceed 10.82 tons per year from emission units R200

Compliance Method
Compliance with the hourly limit shall be based on meeting the requirements for the downdraft air system found in Sections A.II.1, A.III.3, and A.IV.2 of Part III. If required, compliance shall be determined through testing, performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

Compliance with the annual limit shall be based on meeting the requirements for the downdraft air systems specified under Sections A. II. , A.III , and A.IV. of Part III for emissions units R200 and R201, and submitting annual reports or Fee Emission Reports with the calculated emissions of particulate matter, derived from material usage records, at the end of each year.

5. Emission Limitation
33.76 lbs of OC/hr

Compliance Method
If required, the permittee shall conduct, or have conducted, emission testing and develop a mass balance demonstration of organic compound emissions for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 6 months after project completion and mass production startup;

b. the emission testing shall be conducted to demonstrate compliance with the hourly emission limit, through a mass balance demonstration, and to document the overall reduction of OC emissions from the coating operations, after actual control and capture efficiencies are measured;

c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 1 for sample and velocity traverses; Method 2 for velocity and volumetric flow rates; Method 24 for the OC content of the coating; Methods 25 or 25A for destruction efficiency after the RTO; Methods 18, 25 or 25A for the OC concentration in the effluent gas leaving the concentrator; and Methods 204A through F for the capture efficiency of the concentrator. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA; or, any Method of testing may be required/requested by the Administrator; and,

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test"

notification shall describe in detail the proposed test methods and procedures, the

emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Central District Office's refusal to accept the results of the emission test(s).

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

g. 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 the Ohio EPA Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Central District Office.

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
R201 - POPA topcoat process with coating booths, natural gas-fired air supply, oven, concentrator and RTO control (Modification)		Compliance with Ohio Air Toxic Policy

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "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" pollutant:

Pollutant: Cyclohexanone

TLV: 96 mg/m^3 (skin)

Maximum Hourly Emission Rate: 33.76 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 286.1 ug/m^3

MAGLC: 2,293 ug/m^3

2. 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 (typically for coatings or cleanup materials), 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

3. 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