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: 01-07483

DATE: 1/26/00

Honda of America Mfg Inc
Cory Sander
24000 Honda Parkway
Marysville, OH 430409251

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 **$1600** 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,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **CDO**

DRAFT PERMIT TO INSTALL 01-07483

Application Number:	01-07483
APS Premise Number:	0180000130
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Honda of America Mfg Inc
Person to Contact:	Cory Sander
Address:	24000 Honda Parkway Marysville, OH 43040-9251

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

Description of proposed emissions unit(s):
2 plastic injection molding machines, plastic pellett storage and handling and plastics adhesive application.

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

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 <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.11 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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 Related to Monitoring and Recordkeeping 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. 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.

5. 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.

6. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. 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.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

11. 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	6.55
PM	1.32

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

. The terms and conditions of this permit shall supersede all the requirements for molding operations for the emission units contained in the previous Permit to Install for these sources, numbered 01-493.

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
Injection Molding, HPM (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day when using photochemically reactive materials;
	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 1.0 tons total per rolling 12-months from molding plastics on the HPM (P406) and KOBE (P414) mold machines;
		Organic compound emissions shall not exceed 2.4 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on the HPM (P406) and KOBE (P414) mold machines;
	OAC rule 3745-31-05(D)	Material usage shall not exceed 732 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on the HPM (P406) and KOBE (P414) mold machines; and

See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from the molding machines HPM (P406) and KOBE (P414) shall not exceed 3.4 tons of organic compounds (OC). The maximum total material usage of mold release, cleaning and protectant agents, and cleaning solvents in mold machines HPM (P406) and KOBE (P414) together shall not exceed 732 gallons per rolling 12-months.

2.b To ensure enforceability during the first 12 calendar months of this permit, molding machines HPM (P406) and KOBE (P414) shall not exceed the following calculated emissions or exceed the amounts of mold release, cleaning and protectant agents, and cleaning solvents, as specified in the following table:

Month	First 12-Month Organic Comp. Emission Calculations	First 12-Month Mold Treating Material Usage
1	400.0 pounds	61 gallons
2	800.0 pounds	122 gallons
3	1,200.0 pounds	183 gallons
4	1,600.0 pounds	244 gallons
5	2,000.0 pounds	305 gallons
6	2,400.0 pounds	366 gallons
7	2,800.0 pounds	427 gallons
8	3,200.0 pounds	488 gallons
9	3,600.0 pounds	549 gallons
10	4,000.0 pounds	610 gallons
11	4,400.0 pounds	671 gallons
12	4,800.0 pounds	732 gallons

2.c To ensure enforceability during the first 12 calendar months of this permit, molding machines HPM (P406) and KOBE (P414) shall not exceed the following calculated emissions or exceed the amount of plastic pellets molded as specified in the following table:

Month	First 12-Month Organic Comp. Emission Calculations	First 12-Month Plastic Pellet Material Usage
1	166.6 pounds	275.6 tons
2	333.2 pounds	551.2 tons
3	500.0 pounds	826.8 tons

4	666.6 pounds	1,378.0 tons
5	833.2 pounds	1,653.6 tons
6	1,000.0 pounds	1,102.4 tons
7	1,166.6 pounds	1,929.2 tons
8	1,333.2 pounds	2,204.8 tons
9	1,500.0 pounds	2,480.4 tons
10	1,666.6 pounds	2,756.0 tons
11	1,833.2 pounds	3,031.6 tons
12	2,000.0 pounds	3,307.0 tons

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information at the end of each month for the molding operation:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded in both mold machines;

   g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents used; and

   h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including both molding machine's material use):

a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

c. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation (if calculating an average, the total hours molding machines HPM and KOBE were in operation and/or maintenance) (hrs./day); and

d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2.4 tons OC per rolling 12-months from emission units P406 and P414, together;

d. an identification of any monthly record showing OC emissions from the molded plastic to

exceed 1.0 tons OC per rolling 12-months from emission units P406 and P414, together; and

e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 732 gallons from emission units P406 and P414, together.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the HPM and KOBE machines, or may be included as a total of both machines. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. Emission units emitting less than one ton of each criteria pollutant per year can be included in the annual Fee Emission Report or may be reported separately, and by April 15th of each year.

V. Testing Requirements

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

1. Emission Limitation

1.0 tons OC emissions per rolling 12-months from molding plastic in the HPM (P406) and KOBE (P414) mold machines

2.4 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents used on the HPM (P406) and KOBE (P414) mold machines

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure enforceability during the first 12 calendar months of this permit, these emissions units shall not exceed material usage in the amounts of mold release, cleaning and protectant agents, cleaning solvents, and plastic pellets as specified in the tables found in Sections A.I.2.b and A.I.2.c of this permit.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on the HPM and KOBE mold machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

In order to show compliance during the first 12 calendar months of this permit, this calculation shall use the actual monthly rolling pellet usage, not to exceed the usage and emission limits in the table found in Section A.1.2.c.

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and the hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of the mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons

per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

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
Injection Molding, HPM (Modification)	OAC rule 3745-31-05(A)(3)	16.0 lbs OC/hr for both motorcycle molding machines see B.I.2.a below

2. Additional Terms and Conditions

2.a The hourly OC limit was established at the potential to emit and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit.

2.b This permit to install was evaluated based on the actual materials specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0r model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: isopropyl alcohol

TLV : 983 mg/m3

Maximum Hourly Emission Rate: 0.84 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 0.184 mg/m3

MAGLC: 23.4 mg/m3

2.c 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, 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.d 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.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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

Emission Limitation

16.0 lbs OC/hr for both motorcycle molding machines

Applicable Compliance Method

16.0 pounds of OC/hour is more than the potential to emit for the operation or cleaning of both motorcycle molding machines at the same time. The following worst case calculation shall be maintained on file and shall document the potential to emit for the molding units contained in this permit:

Potential to emit organic compounds:

2.4 gallons cleaning solvent/hr x 6.58 lbs/gal (100% volatilized) =15.8 lbs OC/hr

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P414**

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

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
Injection Molding, KOBE (Modification)	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds/hour and 40 pounds/day when using photochemically reactive materials;
	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 1.0 tons total per rolling 12-months from molding plastics on the HPM (P406) and KOBE (P414) mold machines; Organic compound emissions shall not exceed 2.4 tons total per rolling 12-months from mold release, mold cleaner, mold protectant, and cleaning solvents used on the HPM (P406) and KOBE (P414) mold machines;
	OAC rule 3745-31-05(D)	Material usage shall not exceed 732 gallons total of mold release, mold cleaner, mold protectant, and cleaning solvents used per rolling 12-months on the HPM (P406) and KOBE (P414) mold machines; and See A.I.2 below

2. Additional Terms and Conditions

2.a The maximum rolling 12-month emissions from the molding machines HPM (P406) and KOBE (P414) shall not exceed 3.4 tons of organic compounds (OC). The maximum total

material usage of mold release, cleaning and protectant agents, and cleaning solvents in mold machines HPM (P406) and KOBE (P414) together shall not exceed 732 gallons per rolling 12-months.

2.b To ensure enforceability during the first 12 calendar months of this permit, molding machines HPM (P406) and KOBE (P414) shall not exceed the following calculated emissions or exceed the amounts of mold release, cleaning and protectant agents, and cleaning solvents, as specified in the following table:

Month	First 12-Month Organic Comp. Emission Calculations	First 12-Month Mold Treating Material Usage
1	400.0 pounds	61 gallons
2	800.0 pounds	122 gallons
3	1,200.0 pounds	183 gallons
4	1,600.0 pounds	244 gallons
5	2,000.0 pounds	305 gallons
6	2,400.0 pounds	366 gallons
7	2,800.0 pounds	427 gallons
8	3,200.0 pounds	488 gallons
9	3,600.0 pounds	549 gallons
10	4,000.0 pounds	610 gallons
11	4,400.0 pounds	671 gallons
12	4,800.0 pounds	732 gallons

2.c To ensure enforceability during the first 12 calendar months of this permit, molding machines HPM (P406) and KOBE (P414) shall not exceed the following calculated emissions or exceed the amount of plastic pellets molded as specified in the following table:

Month	First 12-Month Organic Comp. Emission Calculations	First 12-Month Plastic Pellet Material Usage
1	166.6 pounds	275.6 tons
2	333.2 pounds	551.2 tons
3	500.0 pounds	826.8 tons
4	666.6 pounds	1,378.0 tons
5	833.2 pounds	1,653.6 tons
6	1,000.0 pounds	1,102.4 tons
7	1,166.6 pounds	1,929.2 tons
8	1,333.2 pounds	2,204.8 tons
9	1,500.0 pounds	2,480.4 tons
10	1,666.6 pounds	2,756.0 tons
11	1,833.2 pounds	3,031.6 tons
12	2,000.0 pounds	3,307.0 tons

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information at the end of each month for the molding operation:

   a. the company identification for each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit;

   b. documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive;

   c. the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed (gal/month);

   d. the calculated total volume in gallons, of all mold release agents, cleaning and protectant agents, and cleaning solvents used per rolling 12-months;

   e. the organic compound content of each mold release agent, cleaning and protectant agent, and cleaning solvent, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   f. the rolling 12-month summation of each polymer type of plastic pellets molded in both mold machines;

   g. the calculated rolling 12-month summation of organic compound emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents used; and

   h. the calculated rolling 12-month summation of organic compound emissions from the molded plastic pellets.

2. The permittee shall collect and record the following information each day this emissions unit is in operation (this may be calculated as an average if including both molding machine's material use):

   a. for each day during which a photochemically reactive material is employed, the calculated number of gallons of each mold release agent, cleaning and protectant agent, and cleaning solvent employed;

   b. for each day during which a photochemically reactive material is employed, the calculated total organic compound emission rate for all mold release agents, cleaning and protectant agents, cleaning solvents, and plastic molded, in pounds per day;

   c. for each day during which a photochemically reactive material is employed, the total

number of hours the emissions unit was in operation (if calculating an average, the total hours molding machines HPM and KOBE were in operation and/or maintenance) (hrs./day); and

d. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic, i.e., (b)/(c), in pounds per hour (average).

IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual organic compound emissions for each such day;

   c. an identification of any monthly record showing OC emissions from the mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 2.4 tons OC per rolling 12-months from emission units P406 and P414, together;

   d. an identification of any monthly record showing OC emissions from the molded plastic to exceed 1.0 tons OC per rolling 12-months from emission units P406 and P414, together; and

   e. an identification of any rolling 12-month record showing total usage of mold release agents, cleaning and protectant agents, and cleaning solvents to exceed 732 gallons from emission units P406 and P414, together.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit. These emissions, for each previous calendar year, may be reported per machine, as an average of the HPM and KOBE machines, or may be included as a

total of both machines. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. Emission units emitting less than one ton of each criteria pollutant per year can be included in the annual Fee Emission Report or may be reported separately, and by April 15th of each year.

V. Testing Requirements

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

1. Emission Limitation

1.0 tons OC emissions per rolling 12-months from molding plastic in the HPM (P406) and KOBE (P414) mold machines

2.4 tons OC emissions per rolling 12-months from mold release agents, cleaning and protectant agents, and cleaning solvents used on the HPM (P406) and KOBE (P414) mold machines

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of mold release agents, cleaning and protectant agents, cleaning solvents, and molded plastic pellets; the organic compound content of each material used; and the rolling 12-month summation of calculated OC emissions. Formulation data from the mold release agent's, cleaning and protectant agent's, and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level. To ensure enforceability during the first 12 calendar months of this permit, these emissions units shall not exceed material usage in the amounts of mold release, cleaning and protectant agents, cleaning solvents, and plastic pellets as specified in the tables found in Sections A.I.2.b and A.I.2.c of this permit.

Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through the calculation of worst case emissions. To determine the actual worst case emission rate the following equation shall be used:

12-month rolling OC emissions from molding plastic pellets = the rolling 12-month pellet usage on the HPM and KOBE mold machines (tons per rolling 12-months) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic (1%)

In order to show compliance during the first 12 calendar months of this permit, this calculation shall use the actual monthly rolling pellet usage, not to exceed the usage and emission limits in the table found in Section A.1.2.c.

2. Emission Limitation

8 pounds OC/hour when using photochemically reactive materials
40 pounds OC/day when using photochemically reactive materials

Applicable Compliance Method

The permittee shall maintain documentation on whether or not each mold release agent, cleaning and protectant agent, and cleaning solvent used in this emissions unit is photochemically reactive.

Compliance with OAC 3745-21-07(G)(2) shall be determined through daily recordkeeping of the calculated usage of mold release agents, cleaning and protectant agents, and cleaning solvents, the organic compound content of each material used, and the hours of operation. Formulation data from the manufacturer shall be used to determine the organic compound content of the mold release agents, cleaning and protectant agents, and cleaning solvents to be used in the calculation of emissions. Plastic material shall be assumed to be less than 1% volatile and calculated at a maximum of 1% for OC emission calculations. Honda shall verify that all new plastic formulations molded in the molding machine are below this level.

Organic compound emissions from the molding process can be calculated at the maximum potential of the mold machine in order to alleviate the need to record pellet usage each hour. Compliance with the organic compound emissions emitted from the molded plastic pellets shall be determined through calculation of worst case emissions. To determine the estimated worst case emission rate the following equation shall be used:

Hourly Emissions =hourly pellet usage or maximum pellet capacity usage rate of machine/hour (pounds or tons/hour) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

Daily Emissions = daily pellet usage or maximum pellet capacity usage rate of machine/day (tons per day) X emission factor from AP-42, Fifth Edition, Table 4.4-2 dated 9/88 (3%) X maximum VOC content of plastic type (1%)

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 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 Measure
Injection Molding, KOBE(Modification)	OAC rule 3745-31-05(A)(3)	16.0 lbs OC/hr for both motorcycle molding machines see B.I.2.a

2. Additional Terms and Conditions

2.a The hourly OC limit was established at the potential to emit and was used to establish compliance with the Toxics Policy. Therefore no recordkeeping is necessary to determine compliance with this limit.

2.b This permit to install was evaluated based on the actual materials specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and are based on both the

materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0r model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: isopropyl alcohol

TLV : 983 mg/m3

Maximum Hourly Emission Rate: 0.84 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 0.184 mg/m3

MAGLC: 23.4 mg/m3

2.c 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, 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.d 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.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a 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

Emission Limitation

16.0 lbs OC/hr for both motorcycle molding machines

Applicable Compliance Method

16.0 pounds of OC/hour is more than the potential to emit for the operation or cleaning of both motorcycle molding machines at the same time. The following worst case calculation shall be maintained on file and shall document the potential to emit for the molding units contained in this permit:

Potential to emit organic compounds:

2.4 gallons cleaning solvent/hr x 6.58 lbs/gal (100% volatilized) =15.8 lbs OC/hr

VI. Miscellaneous Requirements

Issued: To be entered upon final issuance

None.

Issued: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

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
Storage Silo with pneumatic loading of plastic pellets, in motorcycle	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 1.32 tons/yr from loading plastic pellet storage silos for motorcycle molding operations, emission units P415 and P416
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for the motorcycle molding operations. The two plastic pellet storage silos are numbered P415 and P416. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet

loading rate shall not exceed 48 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for the motorcycle plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Honda motorcycle's molding operation pellet storage silos (P415, and P416);

   b. an identification of any annual record showing an exceedance of the limits of 1.32 tons of particulate matter per year from Honda motorcycle's two pellet storage silos

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the two motorcycle silo emissions, or may be included in a total of the motorcycle molding operation's emissions. These reports can be satisfied by including this

emissions unit in the submission of the annual Fee Emission Report. Emission units emitting less than one ton of each criteria pollutant per year can be included in the annual Fee Emission Report or may be reported separately, and by April 15th of each year.

V. Testing Requirements

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

1. Emission Limitation

38.4 lb. PM/hr. from pneumatic loading of plastic pellets into motorcycle storage silo(s),
1.32 tons PM/year from pneumatic loading of plastic pellets into motorcycle storage silo(s)

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the motorcycle facility's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Emissions Unit ID: **P415**

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
Storage Silo with pneumatic loading of plastic pellet, in motorcycle	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Issued: To be entered upon final issuance

Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

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
Storage Silo with pneumatic loading of plastic pellets, in motorcycle	OAC rule 3745-31-05(A)(3)	PM emissions shall not exceed 38.4 lbs/hr nor 1.32 tons/yr from loading plastic pellet storage silos for motorcycle molding operations, emission units P415 and P416
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(A)	The requirements of this PTI are more stringent than the rule

2. Additional Terms and Conditions

None.

II. Operational Restrictions

The permittee shall not allow loading of plastic pellets into more than two storage silos nor from more than two trucks at any one time for the motorcycle molding operations. The two plastic pellet storage silos are numbered P415 and P416. Twenty four tons per hour is the physical limitation and the manufacture's stated maximum capacity of the pneumatic loading machinery from one truck, and this

amount shall be assumed; with two truck unloading operations in process, the maximum hourly pellet loading rate shall not exceed 48 tons per hour.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document the occurrence of the loading of plastic pellets to more than two silos at any one time and/or the unloading of plastic pellets from more than 2 trucks at any one time for the motorcycle plastic pellet storage operations.

2. The permittee shall perform monthly checks for any visible particulate emissions from the vent serving this emissions unit when the pellet storage silo is being loaded. The presence or absence of any visible emissions shall be noted in an operations log or appropriate checksheet. If visible emissions are observed, the permittee shall also note the following in the operations log or appropriate checksheet:

   a. the color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

   a. any daily record showing the silos' pellet pneumatic loading rate to be greater than 48 tons per hour, or the loading of more than two silos or unloading of more than 2 trucks at any one time (24 tons/hour has been documented by the vendor as the operational capacity of the truck's pneumatic system), for Honda motorcycle's molding operation pellet storage silos (P415, and P416);

   b. an identification of any annual record showing an exceedance of the limits of 1.32 tons of particulate matter per year from Honda motorcycle's two pellet storage silos

   The notification shall include a copy of any such record and shall be sent to the Ohio EPA Central District Office as required in the General Terms and Conditions of this permit.

2. The permittee shall also submit annual reports which specify the total PM emissions from this emissions unit. These emissions, for each previous calendar year, may be reported for this silo, or as an average of the two motorcycle silo emissions, or may be included in a total of the

motorcycle molding operation's emissions. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. Emission units emitting less than one ton of each criteria pollutant per year can be included in the annual Fee Emission Report or may be reported separately, and by April 15th of each year.

V. Testing Requirements

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

Issued: To be entered upon final issuance

1. Emission Limitation

38.4 lb. PM/hr. from pneumatic loading of plastic pellets into motorcycle storage silo(s),
1.32 tons PM/year from pneumatic loading of plastic pellets into motorcycle storage silo(s)

Applicable Compliance Method

The truck's physical capacity pneumatic pellet loading rate is 24 tons per hour (worst case or maximum loading rate). No more than two trucks shall be unloaded to the motorcycle facility's silos at any one time.

Compliance with the particulate limits contained in this permit shall be determined through annual calculation of actual or worst case emissions. To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

Hourly Emissions =actual or maximum pellet loading rate (24 tons per hour) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton) X 2 trucks loading/hr= 38.4 lbs/hr

Annual Emissions = annual pellet usage (tons per yr) X emission factor from AP-42, Fifth Edition, Table 6.6.2-1 dated 9/91 (0.8 lbs PM/ton)

2. Emission Limitation

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

The permittee shall perform checks, when the silo is being loaded and when the weather conditions allow, for any visible particulate emissions from the vent serving this emissions unit. 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).

VI. Miscellaneous Requirements

None.

Issued: To be entered upon final issuance

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
Storage Silo with pneumatic loading of plastic pellets, in motorcycle	No State only requirements, see State and Federally Enforceable Section	No State only requirements, see State and Federally Enforceable Section

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

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Part III - Special Terms and Conditions for Specific Emissions Unit(s) [Continued]

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
Plastic Adhesive Application (gun application)	OAC rule 3745-31-05(A)(3)	Organic compound emissions shall not exceed 8.05 pounds/hour; Organic compound emissions shall not exceed 3.15 tons per rolling 12-months;
	OAC rule 3745-31-05(D)	Adhesive use shall not exceed 4,278 gallons per rolling 12-months; Purge/cleaning solvent shall not exceed 600 net gallons per rolling 12-months;
	OAC rule 3745-21-07(G)(9)	Use of only nonphotochemically reactive materials or materials exempt under 3745-21-07(G)(2)

2. Additional Terms and Conditions

2.a The total adhesive used in the plastics adhesive application (R405), as covered in this permit, shall not exceed a net usage of 4,278 gallons per rolling 12-months. The total purge/cleaning solvent used in the plastics adhesive application (R405), as covered in this permit, shall not exceed a net usage of 600 gallons per rolling 12-months.

For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling 12-month adhesive and cleaning solvent/purge usage

(gallons/rolling twelve-months) and OC emissions shall be calculated based upon the actual material usage and OC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.

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II. Operational Restrictions

Only non-photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) or materials exempt, under 3745-21-07(G)(9), can be applied to parts or components coated in this emissions unit and equipment and materials purged or cleaned in this emissions unit. The use of photochemically reactive materials in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of the company identification for each adhesive and cleanup material employed, their chemical composition, and documentation to show these materials are nonphotochemically reactive

2. The permittee shall collect and record the following information for each day for the coating operation:

   a. the company identification for each adhesive and cleanup material employed;

   b. the number of gallons of each adhesive and cleanup material employed, less any cleanup material collected for recycle or disposal at an outside facility if this recovered material is tracked;

   c. the organic compound content of each adhesive and cleanup material, in pounds per gallon, as provided by the manufacturer of the material (lbs OC/gal);

   d. the total organic compound emission rate for all adhesive and cleanup materials, in pounds per day;

   e. the total number of hours the emissions unit was in operation; and

   f. the average hourly organic compound emission rate for all adhesive and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

   [Note: The coating information must be for the adhesives as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall collect and record the following information, at the end of each month for the adhesive operation:

   a. the number of gallons of each plastic adhesive material and cleaning solvent employed

(gal/month), less any cleanup material collected for recycle or disposal at an outside facility if this recovered material is tracked;

b. the total volume in gallons, of all plastic adhesive material and cleaning solvent used per rolling 12-months; and

c. the calculated rolling 12-month summation of organic compound emissions from the plastic adhesive material and cleaning solvent used.

IV. Reporting Requirements

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

a. an identification of any day during which a photochemically reactive material was employed in this emissions unit, an identification of this material and it's composition, the day(s) and duration of time it was used, the cause for the use of the photochemically reactive material(s), the estimated total quantity of photochemically reactive material(s) used, and the estimated emissions from each such use, in pounds;

b. an identification of each day during which the average hourly organic compound emissions, from the plastic adhesive material and cleaning solvent application, exceeded 8.05 pounds per hour, and the actual average hourly organic compound emissions for each such day;

c. an identification of any monthly record showing OC emissions from the plastic adhesive and cleaning solvent to exceed 3.15 tons OC per rolling 12-months;

d. an identification of any rolling 12-month record showing total usage of plastic adhesive materials to exceed 4,278 gallons; and

e. an identification of any rolling 12-month record showing the total net usage of cleaning solvent to exceed 600 gallons.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports can be satisfied by including this emissions unit in the submission of the annual Fee Emission Report. If the emissions unit emits less than one ton of organic compounds per year, these emissions can be included in the annual Fee Emission Report or may be reported separately, and by April 15th of each year.

V. Testing Requirements

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

1. Emission Limitation

3.15 tons OC emissions per rolling 12-months from plastic adhesive material and cleaning solvent

Applicable Compliance Method

Compliance with the rolling 12-month OC limit shall be determined through monthly and 12-month rolling recordkeeping of the amount of plastic adhesive material and cleaning solvent; the organic compound content of each material used; and the rolling 12-month summation of calculated OC emissions. Formulation data from the plastic adhesive material and cleaning solvent's manufacturers shall be used to determine the organic compound content of the materials, to be used in the calculation of emissions. To ensure enforceability during the first 12 calendar months of operation, the rolling 12-month adhesive and cleaning solvent/purge usage (gallons/rolling twelve-months) shall be calculated based upon the actual material usage, initially including the twelve month period prior to issuance of this PTI and rolling with each passing month. Compliance with the 12-month rolling organic compound emissions emitted from the plastic adhesive shall be calculated monthly as follows:

12-month rolling emissions = the rolling 12-month plastic adhesive usage X maximum OC content of plastic adhesive + the rolling 12-month plastic adhesive application's net cleanup/purge usage X maximum OC content of cleanup/purge

2. Emission Limitation

8.05 pounds OC/hour

Applicable Compliance Method

Compliance with the hourly OC emission limit shall be determined through daily recordkeeping of the plastic adhesive and cleaning solvent usage, the organic compound content of each material used, and the operating hours per day. Formulation data from the manufacturer shall be used to determine the organic compound content of the plastic adhesive and cleaning solvent to be used in the calculation of emissions. Hourly emissions shall be calculated by multiplying the OC content of the adhesive and cleanup material used (lbs OC/gallon of material) times the adhesive and cleanup material's maximum usage in any hour (gallons/hr). If the emissions unit has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of each day by the hours the emissions unit ran during that day. Calculations shall be documented as follows:

OC emissions/hr = (OC/gal of adhesive) x (maximum adhesive usage in gal/hr) +(OC/gal of cleaning material) x (maximum cleaning material usage in gal/hr) or as per above:

OC emissions/hr = [(OC/gal of adhesive) x (maximum adhesive usage in gal/ day) + (OC/gal of cleaning material) x (maximum cleaning material usage in gal/day)] x (1 day /hours of operation)

VI. Miscellaneous Requirements

None.

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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
Plastic Adhesive Application (gun application)	OAC rule 3745-31-05(A)(3)	See Section VI.1

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. **Ohio Air Toxic Policy**

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 Chapter 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.