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: 01-08875
Fac ID: 0180000130
DATE: 7/7/2005

Honda of America Mfg., Inc.
John Cwiklewski
24000 Honda Parkway
Marysville, OH 43040

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 **$ 0** 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**

UNION COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-08875** FOR AN AIR CONTAMINANT SOURCE FOR
Honda of America Mfg., Inc.

On 7/7/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Honda of America Mfg., Inc.**, located at **24000 Honda Parkway, Marysville**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08875:

Injection Molding Machine.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]

DRAFT MODIFICATION OF PERMIT TO INSTALL 01-08875

Application Number:	01-08875
Facility ID:	0180000130
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Honda of America Mfg., Inc.
Person to Contact:	John Cwiklewski
Address:	24000 Honda Parkway Marysville, OH 43040

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

Description of proposed emissions unit(s):
Injection Molding Machine.

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 <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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

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

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 re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to

the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from

disclosure to the public of confidential information consistent with ORC section 3704.08.

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

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

10. Permit-To-Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

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

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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)

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

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. 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.

8. 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., postmarked), 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	4.45

Emissions Unit ID: P417

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
P417 - Plastic injection molding machine	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 16.0 lbs/hour. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-07(G)(2).
	OAC rule 3745-31-05(C)	OC emissions shall not exceed 2.0 tons per rolling, 12-month period from molding plastics on P417 and P414 combined. OC emissions shall not exceed 2.45 tons per rolling, 12-month period from mold release, mold cleaner, mold protectant, and cleaning solvents used on P417 and P414 combined. See Section A.II.1 and A.II.2 below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds/hr and 40 pounds/day when using photochemically reactive

materials. This emission unit is exempt from the emission limitation of OAC rule 3475-21-07(G)(2) when employing only non-photochemical reactive materials or material exempt under 3745-21-07(G)(9).

2. Additional Terms and Conditions

2.a The 16.0 lbs OC/hour limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping, and reporting requirements to ensure compliance with this emission limitation.

2.b To ensure federal enforceability during the first 12 calendar months of this permit, material usage records from the previous 12 calendar months of operation of P414 and P417, and emissions calculated from these records, shall be used to document compliance with the rolling, 12-month emission and material usage limits.

II. Operational Restrictions

1. The maximum molding plastic pellet usage on molding machinesP414 and P417 shall not cause emissions to exceed 2.0 tons of OC per rolling, 12-month period, calculated using the following formula:

$$2.0 \text{ tons OC} \geq \sum_{n=1}^{i} \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of molding plastic pellet usage, in pounds
OC_i = organic compound content of material i, in pounds of OC/ton of material

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

2. The maximum mold release, mold cleaner, mold protectant, and cleaning solvent usage on molding machines P414 and P417 shall not cause emissions to exceed 2.45 tons of OC per rolling, 12-month period, calculated using the following formula:

$$2.45 \text{ tons OC} \geq \sum_{n=1}^{i} \frac{(M_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

M*i* = usage of mold release, mold cleaner, mold protectant and/or cleaning solvent *i*, in gallons
OC*i* = organic compound content of material *i*, in pounds of OC/gallon

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for P417 and P414 combined:

   a. the company identification for each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed;

   b. documentation on whether or not each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed is photochemically reactive;

   c. the total number of gallons of each mold release, mold cleaner, mold protectant, and cleaning solvent employed, in gallons/month;

   d. the OC content of each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets, in pounds/gallon or pounds/pound;

   e. the calculated OC emissions from mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets;

   f. the total amount of each polymer type of plastic pellets molded, in pounds;

   g. the calculated OC emissions from plastic molding;

   h. the calculated rolling, 12-month summation of total OC emissions from mold release, mold cleaner, mold protectant, and cleaning solvent employed, in tons; and

   i. the calculated rolling, 12-month summation of total OC emissions from the molded plastic pellets, in tons.

2. The permittee shall collect and record the following information on a daily basis when employing photochemically reactive materials:

   a. the number of gallons of each mold release, mold cleaner, mold protectant, and cleaning solvent employed in this emissions unit;

b. the OC content of each mold release, mold cleaner, mold protectant, cleaning solvent, and polymer type of plastic pellets employed in this emissions unit, in pounds/gallon or pounds/pound;

c. the total amount of each polymer type of plastic pellets molded, in pounds;

d. the calculated total OC emission rate for all mold release, mold cleaner, mold protectant, cleaning solvent, and molded plastic employed in this emissions unit, in pounds per day;

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

f. the average hourly OC emission rate from all mold release, mold cleaner, mold protectant, cleaning solvent, and molded plastic employed in this emissions unit (i.e., (d)/(e)), in pounds per hour and pounds per day.

IV. Reporting Requirements

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

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

b. for the days during which photochemically reactive material was employed in this emissions unit, an identification of each day during which the OC emissions from mold release, mold cleaner, mold protectant, cleaning solvents, and molded plastic exceeded 40 pounds per day, and the actual average hourly OC emissions for each such day;

c. an identification of any monthly record showing OC emissions from the mold release, mold cleaner, mold protectant, and cleaning solvents exceeded 2.45 tons OC per rolling, 12-month period from emissions units P417 and P414 combined; and

d. an identification of any monthly record showing OC emissions from the molded plastic exceeded 2.0 tons OC per rolling, 12-month period from emissions units

P417 and P414 combined.

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

2. The permittee shall submit annual reports by April 15th which specify the total OC emissions from this emissions unit for the previous calender year. These emissions may be reported per machine, as an average of P417 and P414, or may be included as a total of both machines. These reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report due by April 15th of each year.

V. Testing Requirements

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

   a. Emission Limitations**:**
   2.0 tons OC/rolling, 12-month period from molding plastics on P417 and P414 combined
   2.45 tons per rolling, 12-month period from mold release, mold cleaner, mold protectant, and cleaning solvents used on P417 and P414 combined**.**

   Applicable Compliance Method**:**
   Compliance with these rolling 12-month limits may be determined through the record keeping specified in Section A.III. 1.h and 1.i above.

   U.S. EPA Method 24 or formulation data for the mold release, mold cleaner, mold protectant, cleaning solvents, and molded plastic shall be used to determine the OC content of the materials to be used in the calculation of emissions.

   .b. Emission Limitations:
   OC emissions shall not exceed 8 pounds/hr and 40 pounds/day when using photochemically reactive materials.

   Applicable Compliance Determination:
   Compliance may be determined by the record keeping specified in Sections A.III.2.d and 2.f above.

   c. Emission Limitation:
   16.0 lbs OC/hour from this emissions unit.

   Applicable Compliance Method:
   The hourly OC limit was established by summing the maximum potential emissions from mold release, mold cleaner, mold protectant, cleaning solvents, and molded plastic from this emissions unit using the following formulas:

   <u>Molded Plastic:</u>
   (maximum plastic pellet usage of 1523 lbs/hr) x (emission factor of 3% from AP-42, Fifth Edition, Table 4.4-2, 9/88*) x (maximum OC content of 1% per

pound of material).

Mold Release, Cleaner, and Protectant:
(maximum usage of 2.2 gal/hr) x (maximum OC content of mold material in lb/gal).

* On March 18, 1998, this section of AP-42 was temporarily removed because of an inconsistency with the emission factors for open molding processes. U.S. EPA has stated that the emission factors for the closed molding operations listed in Table 4.4-2 are still valid. This emission factor reflects the total weight percentage of the inputted resin emitted during closed molding operations. The total OC emissions are dependent on the OC content of the plastic material.

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
P417 - Plastic injection molding machine	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 emissions units P417 was evaluated based on actual materials (typically coatings and cleanup materials) and the design parameters of the emission 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 these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA-approved model). The predicted 1-hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

   Pollutant: Isopropanol
   TLV (ug/m3): 492,000
   Maximum Hourly Emission Rate (lbs/hr): 16.0
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2070

Emissions Unit ID: P417

MAGLC (ug/m3): 11,703

Pollutant: Styrene
TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 15.23
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1971
MAGLC (ug/m3): 2029

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

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

a. a description of the parameters changed (composition of materials, new

pollutants emitted, change in stack/exhaust parameters, etc.);

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None