State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION** **CERTIFIED MAIL**
**UNION COUNTY**

Street Address:
122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**Application No: 01-08869**
**Fac ID:** 0180000130
**DATE: 10/6/2005**

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

**CC: USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install** **Issue Date: 10/6/2005**
**Terms and Conditions** **Effective Date: 10/6/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08869

| | |
|---|---|
| Application Number: | 01-08869 |
| Facility ID: | 0180000130 |
| Permit Fee: | **$400** |
| Name of Facility: | Honda of America Mfg., Inc. |
| Person to Contact: | John Cwiklewski |
| Address: | 24000 Honda Parkway<br>Marysville, OH 43040 |

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

Description of proposed emissions unit(s):
**Modify K001 - K004 to reallocate the allowable emissions. This will not increase overall emissions.**

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

Joseph P. Koncelik

Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

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

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

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

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

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (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 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 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. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., 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.

**Honda of America Mfg., Inc.** **Facility ID: 018000013**
**PTI Application: 01-08869**
**Modification Issued: 10/6/2005**

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

| Pollutant | Tons Per Year |
|---|---|
| VOC | 236.5 |
| PE | 20.2 |
| NOx | 25.11 |
| CO | 21.09 |

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

1. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63 Subpart PPPP (Surface Coating of Plastic Parts and Products) in accordance with 40 CFR Parts 63.4480 - 63.4581 including the Table(s) and Appendix(ices) referenced in Subpart PPPP.

   The permittee may also be subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63 Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) in accordance with 40 CFR Parts 63.3880 - 63.3981 including the Table(s) and Appendix(ices) referenced in Subpart MMMM.

   As specified in the Subparts, the permittee shall submit the following notifications:

   a. Unless otherwise specified in the relevant Subpart, within 120 days after promulgation of a 40 CFR Part 63 Subpart to which the source is subject, the permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2):

   i. the name and mailing address of the permittee;

   ii the physical location of the source if it is different from the mailing address;

   ii identification of the relevant MACT standard and the source's compliance date;

   iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and

   v. a statement confirming the facility is a major source for HAPs.

   b. Unless otherwise specified in the relevant Subpart, within 60 days following completion of any required compliance demonstration activity specified in the relevant Subpart, the permittee shall submit a notification of compliance status that contains the following information:

i. the methods used to determine compliance;

ii. the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

iv. the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in the relevant Subpart;

v. an analysis demonstrating whether the affected source is a major source or an area source;

vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

vii. a statement of whether or not the permittee has complied with the requirements of the relevant Subpart.

## 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 | |
|---|---|---|
| K401 - MMP Paint Line 1 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator (modification of PTI #01-08584) | OAC rule 3745-31-05(A)(3) | |
| | | OAC rule 3745-31-05(C) |
| | | OAC rule 3745-21-09(U)(1) |
| | | OAC rule 3745-21-07(G)(2) |

| | | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| OAC rule 3745-17-07(A)(1) | 40 CFR Part 63, Subpart MMMM<br>40 CFR Part 63, Subpart PPPP | The volatile organic compound (VOC) content of any coating employed in this emissions unit shall not exceed 6.5 lbs/gallon, as applied, when coating metal motorcycle parts and any non-metal parts. |
| OAC rule 3745-17-11(B)(1) | | Particulate emissions (PE) from overspray shall not exceed 5.49 tons/yr. |
| OAC rules 3745-21-08(B) and 3745-23-06(B) | | Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed: |
| OAC rule 3745-21-09(U)(1)(a) | | 5.73 lbs of nitrogen oxides (NOx)/hr and 25.11 tons of NOx/yr;<br>4.82 lbs of carbon monoxide (CO)/hr and 21.09 tons of CO/yr;<br>0.11 lb of PE/hr (filterable) and 0.48 ton of PE/yr (filterable); and<br>0.32 lb of organic compounds (OC)/hr and 1.38 tons of OC/yr.<br><br>See Section A.I.2.e below. |
| OAC rule 3745-21-09(U)(1)(c) | | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(C). |
| OAC rule 3745-21-09(U)(1)(d) | | VOC emissions shall not exceed 27.2 tons per rolling, 12-month period, excluding emissions from natural gas combustion. |

| | |
|---|---|
| | See Section A.I.2.d below. |
| See Section A.I.2.c below. | |
| Pursuant to OAC rule 3745-21-09(U)(2)(i), this emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) when coating motorcycles. | The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts. |
| On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. | The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts. |
| This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts. | The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids. |
| Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. | See Part II.A.1 of this permit. |
| PE from coating overspray shall not exceed 1.83 lbs/hr, based on Table I from this rule. | |

**2. Additional Terms and Conditions**

**2.a** The emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a control (destruction) efficiency of not less than 90%. Based on emission testing conducted for emissions unit K403 on April 18, 2002, the amount of VOC emissions entering the oven shall be considered to be approximately 3% of the total uncontrolled emissions.

**2.b** The annual PE limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with this emission limitations.

**2.c** The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 27.2 tons of VOC per rolling, 12-month period, calculated using the following formula:

27.2 tons VOC = summation of all coatings and cleanup materials such that {[(Pi) x (VOCpi) x (1-(CE X DRE)] / 2000} - {[(Si) x (VOCsi)] / 2000}

where:

Pi = usage of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
VOCpi = VOC content of coating, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight
CE = capture efficiency (percent of emissions entering the incinerator)
DRE = destruction removal efficiency of the incinerator
Si = recovery of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
VOCsi = VOC content of the recovered coatings, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight

The credit for the recovered materials shall be calculated per Sections A.III.2 and A.III.6 below.

**2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

**2.e** Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 57.33 MMBtu/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

## II. Operational Restrictions

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time while the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:

   a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each

material to show that it is either photochemically reactive, as defined in OAC rule 3745-21-01(C), non-photochemically reactive, and/or exempt as per OAC rule 3745-21-07(G)(9);

b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;

c. the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;

d. the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;

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

f. the average hourly OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in lbs/hr (average).

2. The permittee shall collect and record the following information each month for the purpose of determining rolling, 12-month emissions and material usage, and to document the VOC content of coatings applied in the coating operation:

a. the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;

b. the VOC content of all coatings, as applied, in pounds per gallon or percent, by weight;

c. the VOC content of all coatings, reducing solvents, purge, and cleanup materials, in pounds per gallon or percent, by weight;

d. the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;

e. the calculated total VOC emission rate for all coatings, reducing solvents, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;

f. if a credit for recovered material is to be used, the total amount (gallons) of unused coating and reducing solvent, recovered purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery and/or disposal at an outside facility, and the mass (lbs) of VOC to be credited to the emission calculations for this emissions unit, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested,

and calculated as per Section A.III.6;

g. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f, lbs)); and

h. the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit.

3. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

If the permittee mixes complying coatings at the paint line, it is not necessary to record the VOC content of the resulting mixture.

4. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:

a. the name and identification of each coating, as applied;

b. the VOC content of each coating (excluding water and exempt solvents), as applied;

c. the total number of gallons or pounds of each coating, as applied; and

d. the daily volume-weighted average VOC content of all coatings, as applied.

5. During any period when coating metal non-motorcycle parts and demonstrating compliance with an applicable pounds of VOC per gallon of solids emission limitation by use of control equipment, the permittee shall collect and record the following information each day:

a. the name and identification number of each coating, as applied;

b. the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;

c. the solids content (percent, by volume), as applied, of each coating;

d. the total number of gallons or pounds of each coating, as applied; and

e. the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

6. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the unused coatings, reducing solvents, recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:

a. the date the recovery drum or tank was emptied;

b. the date the materials from the recovery drum or tank were shipped off site;

c. the number of gallons of materials from the recovery drum or tank shipped off site;

d. the VOC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total VOC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emissions units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.

7.
The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

8. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

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

   b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

10. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

   a. the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and
   b. the total summation of OC, PE, NOx, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

## IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day;

   c. any record showing that the water curtain was not in service when the emissions

unit was in operation;

d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above while the emissions unit was in operation;

e. any monthly record showing the use of non-complying coatings, i.e., those coatings exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycle parts or non-metal parts; and

f. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

The quarterly deviation reports referenced above shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Terms and Conditions.

2. When coating metal non-motorcycle parts with compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

3. When coating metal non-motorcycle parts and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit
   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

4. When coating metal non-motorcycle parts and complying with a pounds of VOC per gallon of solids emission limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following emission limitations:

10.3 lbs VOC/gal of solids for clearcoat
6.7 lbs VOC/gal of solids for an extreme performance coating
6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

5. The permittee shall submit annual reports that specify the total OC, PE, CO, and NOx emissions from natural gas combustion from emissions units K401 through K404, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

   a. Emission Limitations:
   8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal parts

   Applicable Compliance Method:
   Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions.

   If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

   b. Emission Limitation:
   Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

   Applicable Compliance Method:

If required, compliance with this emission limitation 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).

c. Emission Limitation:
1.83 pounds particulate emissions/hr from coating overspray

Applicable Compliance Method:
Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 3745-17-11(B)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
5.49 tons PE/yr from coating overspray

Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system specified in Sections A.II.1, A.III.7, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

e. Emission Limitation:
The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less that 90%. Based on testing conducted on emissions unit K403 on April 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 3% of the total uncontrolled emissions.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the destruction efficiency and determine oven capture through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A for destruction efficiency, the VOC concentration at the source of the coating's application and effluent gas entering and leaving the emission control device and Methods 204A through F for capture efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emission testing was conducted for the incinerator controlling this emissions unit

on April 18, 2002. The emission tests demonstrated compliance with the destruction efficiency limitation for this emissions unit.

f. Emission Limitations:
When coating metal non-motorcycle parts:
4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method:
Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.3, A.III.4, and A.III.5. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

g. Emission Limitation:
6.5 lbs VOC/gallon for any coating applied to metal motorcycle parts or non-metal parts

Applicable Compliance Method:

Compliance with this VOC limitation may be determined through monthly recordkeeping, as specified in Section A.III.2, of coating usage and the VOC content of each coating applied to metal motorcycles parts and/or non-metal parts in this emissions unit. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

h. Emission Limitations:
Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.73 lbs of NOx/hr;
25.11 tons of NOx/yr;
4.82 lbs of CO/hr;
21.09 tons of CO/yr;

0.11 lb of PE/hr (filterable);
0.48 ton of PE/yr (filterable); and
0.32 lb of OC/hr;
1.38 tons of OC/yr.

Applicable Compliance Method:
The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined, including a 20% safety factor (57,330 ft3/hr), by the emission factors for each pollutant (lbs of pollutant/MM ft3) found in "Compilation of Air Pollutant Emission Factors", the 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.10), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

i. Emission Limitation:
27.2 tons VOC per rolling, 12 month period, excluding emissions from natural gas combustion

Applicable Compliance Method:
Compliance with this emission limitation shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions. Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 months emission calculations.

## VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those identified in PTI 01-8584 as originally issued August 27, 2002 and issued as a corrected copy November 7, 2002.

## 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 |
|---|---|---|
| K401 - MMP Paint Line 1 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator (modification of PTI #01-08584) | Ohio Air Toxic Policy | See Section B.III below. |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (K401) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Cyclohexanone
TLV (mg/m3):
Maximum Hourly Emission Rate (lbs/hr): 45.07
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1419 (Stack 1015)
MAGLC (ug/m3): 2308

Pollutant: Methyl N-Amyl Ketone
TLV (mg/m3): 233
Maximum Hourly Emission Rate (lbs/hr): 90.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4599 (Stack 1015)
MAGLC (ug/m3): 5547

Pollutant: 1,2,4 Trimethylbenzene
TLV (mg/m3): 123
Maximum Hourly Emission Rate (lbs/hr): 14.66
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 316.6 (Stack 1015)
MAGLC (ug/m3): 2928

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used, 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.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be

required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

1. The terms and conditions of this permit supercede those identified in PTI 01-8584 as originally issued August 27, 2002 and issued as a corrected copy November 7, 2002.

Emissions Unit ID: K402

**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 | |
|---|---|---|
| K402 - MMP Paint Line 2 - metal and non-metal coating line with natural gas baking oven (modification of PTI #01-08318) | OAC rule 3745-31-05(A)(3) | |
| | | OAC rule 3745-31-05(C) |
| | | OAC rule 3745-21-07(G)(2) |
| | | OAC rule 3745-21-09(U)(1) |
| | | OAC rule 3745-17-07(A)(1) |

| | Applicable Emissions Limitations/Control Measures | |
|---|---|---|
| OAC rule 3745-17-11(B)(1) | Particulate emissions (PE) from the coating's application, storage, and handling shall not exceed 0.10 ton of particulate emissions per year. | 3745-17-11(B)(1), and 3745-31-05(C).<br><br>VOC emissions not to exceed 3.1 tons per rolling, 12-month period, excluding emissions from natural gas combustion. |
| OAC rule 3745-21-09(U)(1)(a) | The volatile organic compound (VOC) content of any non-powder coating employed in this emissions unit shall not exceed 6.5 lbs/gallon, as applied, when coating metal motorcycle parts and any non-metal parts.<br><br>See Section A.I.2.a below. | Section A.I.2.b below.<br><br>On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. |
| OAC rule 3745-21-09(U)(1)(c) | Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:<br><br>5.73 lbs of nitrogen oxides (NOx)/hr and 25.11 tons of NOx/yr;<br>4.82 lbs of carbon monoxide (CO)/hr and 21.09 tons of CO/yr;<br>0.11 lb of PE/hr (filterable) and 0.48 ton of PE/yr (filterable); and<br>0.32 lb of organic compounds (OC)/hr and 1.38 tons of OC/yr.<br><br>See Section A.I.2.c below. | This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts. |
| OAC rule 3745-21-09(U)(1)(d) | | Pursuant to OAC rule 3745-21-09(U)(2)(i), this emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) when coating motorcycles.<br><br>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.<br><br>PE from coating application shall not exceed 0.551 lb/hr, based on Table I from this rule. |
| 40 CFR Part 63, Subpart MMMM<br>40 CFR Part 63, Subpart PPPP | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-17-07(A)(1), | The VOC content of any non-powder clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal excluding water and exempt solvents, or if a control system is |

employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

The VOC content of any non-powder extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

The VOC content of any non-powder coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids.

See Part II.A.1 of this permit.

**2. Additional Terms and Conditions**

**2.a** The powder coatings applied in this emissions unit shall not exceed an volatile organic compound content of 12%, by weight.

Emissions Unit ID: K402

**2.b** The maximum coating and cleanup material usage, for this emissions unit, shall not cause emissions to exceed 3.1 tons of VOC per rolling, 12-month period, calculated using the following formula:

the 12-month rolling coating and cleanup material VOC emissions ( 3.1 tons) = summation of all coatings and cleanup materials such that (Pi)x(VOCpi) / 2000 + (Sj-Sr) x (VOCsj) / 2000

where:

| | |
|---|---|
| Pi = | Usage of powder coating i, in pounds |
| VOCpi = | VOC content of powder coat i, in percent, by weight |
| Sj = | Usage of cleanup material j, in gallons |
| Sr = | Recovery of cleanup material j, in gallons |
| VOCsj = | VOC content of clean-up material j, in pounds per gallon |

The credit for the recovered material shall be calculated proportionately according to this emissions unit's VOC contribution, by volume, to the drum or container to be sent off-site, as per Section A.III.6.

**2.c** Additional natural gas combustion sources (no individual burner greater than 10 MMBtu/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met

and the total burner capacity remains below the 57.33 MMBtu/hr specified in the PTI applications.

The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

## II. Operational Restrictions

1. The powder coating operation shall not be operated without the use of the primary and secondary filters.

2. The powder coating line shall be run through two coating booths, built in series. Motorcycle bodies and/or parts shall be coated in only one of the two coating booths. A second color booth will reduce the amount of purge and cleanup materials needed for line color changes. Final touch-up or cleanup activities may be conducted in one booth after transferring production to the second booth. These additional activities shall be included in estimates of emissions.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:

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

   b. the number of gallons of each purge and cleanup material and the pounds or tons of powder coating employed;

   c. documentation on the content of each material employed to show that only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) are applied in this emissions unit;

   d. the total organic compound content of each coating and purge/cleanup material, in pounds per gallon or percent, by weight, of coating;

   e. the calculated total organic compound emission rate for all coatings, purge, and

cleanup materials, prior to the credit for recovered materials, in pounds per month;

f. if a credit for recovered material is to be used, the total amount (gallons) purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery/disposal at an outside facility, and

the mass (lbs) of OC/VOC to be credited to the calculations of K402's emissions, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested and calculated as per Section A.III.2;

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

h. the rolling, 12-month organic compound emissions, calculated per the formula found in Section A.I.2.b.

Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 month's emission calculations.

2. During any period when coating metal non-motorcycle parts with a non-powder coating and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:

a. the name and identification number ot eac coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

If the permittee mixes complying coatings at the paint line, it is not necessary to record the VOC content of the resulting mixture.

3. During any time period when coating metal non-motorcycle parts with a non-powder coating and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:

a. the name and identification of each coating, as applied;

b. the VOC content of each coating (excluding water and exempt solvents), as applied;

c. the total number of gallons or pounds of each coating, as applied; and

d. the daily volume-weighted average VOC content of all coatings, as applied.

4. During any period when coating metal non-motorcycle parts with a non-powder coating and demonstrating compliance with an applicable pounds of VOC per gallon of solids limitation by use of control equipment, the permittee shall collect and record the following information each day:

   a. the name and identification number of each coating, as applied;

   b. the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;

   c. the solids content (percent, by volume), as applied, of each coating;

   d. the total number of gallons or pounds of each coating, as applied; and

   e. the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

5. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:

   a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each material to show that it is either photochemically reactive, as defined in OAC rule 3745-21-01(C), non-photochemically reactive, and/or exempt as per OAC rule 3745-21-07(G)(9);

   b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;

   c. the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;

   d. the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;

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

   f. the average hourly OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in lbs/hr (average).

6. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup and purge materials, and the

recovery drum or tank serving this/these emissions units:

a. the date the recovery drum or tank was emptied;

b. the date the materials from the recovery drum or tank were shipped off site;

c. the number of gallons of materials from the recovery drum or tank shipped off site;

d. the VOC content of the materials from the recovery drum/tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds or tons) from recovered material (purge and cleanup materials), to be credited against the total VOC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emissions units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.

7. The permittee shall maintain records that document any time periods when the primary and secondary filters were not in service when the emissions unit was in operation.

8. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

a. the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and

b. the total summation of OC, PE, NOx, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

## IV. Reporting Requirements

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

a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day;

b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day;

c. any record showing the primary and/or secondary filtration systems were not in

service when the emissions unit was in operation;

d. any monthly record showing the use of non-powder coatings, exceeding 6.5 pounds of VOC per gallon, as applied, when coating metal motorcycle parts or non-metal parts; and

e. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Terms and Conditions.

2. The permittee shall submit deviation (excursion) reports that identify any record showing an exceedance of the 12%, by weight, VOC content limitation for the powder coatings applied in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

3. When coating metal non-motorcycle parts with non-powder coatings and using compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

4. When coating metal non-motorcycle parts with non-powder coatings and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

5. When coating metal non-motorcycle parts with non-powder coatings and complying with a pounds of VOC per gallon of solids limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily

record showing an exceedance of the following limitations:

10.3 lbs VOC/gal of solids for clearcoat
6.7 lbs VOC/gal of solids for an extreme performance coating
6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs. The permittee shall submit annual reports that specify the total OC, PE, CO, and NOx emissions from natural gas combustion from emissions units K401 through K404, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

   a. Emission Limitation:
   3.1 tons VOC per rolling, 12-month period from coatings and cleanup, excluding emissions from natural gas combustion

   Applicable Compliance Method:
   Compliance with this emission limitation shall be determined through monthly recordkeeping, as specified in Section A.III.1, and using the formula specified in Section A.I.2.b. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the organic compound content of the coating, purge, and cleanup materials, to be used in the calculation of emissions.

   b. Emission Limitation:
   Particulate emissions (PE) from the application, storage, and handling of powder coatings shall not exceed 0.10 ton per year.

   Applicable Compliance Method:
   Particulate emissions from the application, storage, and handling of powder coatings shall be demonstrated by maintaining records of coating usage as per Section A.III.1. Control efficiency shall be calculated at 99.9% for the primary

and secondary filters combined. Malfunction of the primary and/or secondary filters, while the emissions unit is in operation, shall be recorded and reported as required in Sections A.III.7 and A.IV.3. Worst case emissions shall be documented in the following formula:

208,000 lbs coating/yr X (100%-99.9% control) X 1 ton/2000 lbs = 0.10 ton PE/yr

c. Emission Limitations:
Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.73 lbs of NOx/hr;
25.11 tons of NOx/yr;
4.82 lbs of CO/hr;
21.09 tons of CO/yr;
0.11 lb of PE/hr (filterable);
0.48 ton of PE/yr (filterable); and
0.32 lb of OC/hr;
1.38 tons of OC/yr.

Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined including a 20% safety factor (57,330 ft3/hr) by the emission factors for each pollutant (lbs of pollutant/MM ft3) found in "Compilation of Air Pollutant Emission Factors", the 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.8), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

d. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

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

e. Emission Limitations:
8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

f. Emission Limitations:
When applying non-powder coatings to metal, non-motorcycle parts:
4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method:
Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.2, A.III.3, and A.III.4. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

g. Emission Limitation:
6.5 lbs VOC/gallon for any non-powder coating applied to metal motorcycle parts or non-metal parts

Applicable Compliance Method:
Compliance with this VOC limitation may be determined through monthly recordkeeping, as specified in Section A.III.1, of coating usage and the VOC content of each coating applied to metal motorcycles parts and/or non-metal

parts in this emissions unit. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

h. Emission Limitation:
PE from coating application shall not exceed 0.551 lb/hr.

Applicable Compliance Method:
Compliance with this emission limitation may be based on meeting the requirements for the primary and secondary filters found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 3745-17-11(B)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

## VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those identified in PTI 01-8318, issued April 5, 2001.

## 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 |
|---|---|---|
| K402 - MMP Paint Line 2 - metal and non-metal coating line with natural gas baking oven (modification of PTI #01-08318) | Ohio Air Toxic Policy | See Section B.III below. |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (K402) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. 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 at the fenceline:

Pollutant: caprolactam
TLV (mg/m3): 23 mg/m3
Maximum Hourly Emission Rate: 7.84 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 68.23 ug/m3
MAGLC : 547.6 ug/m3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used, 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.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   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

1. The terms and conditions of this permit supercede those identified in PTI 01-8318, issued April 5, 2001.

**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 | |
|---|---|---|
| K403 - MMP Paint Line 3 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator (modification of PTI #01-6642) | OAC rule 3745-31-05(A)(3) | |
| | | OAC rule 3745-31-05(C) |
| | | OAC rule 3745-21-09(U)(1) |
| | | OAC rule 3745-21-07(G)(2) |

| | | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| OAC rule 3745-17-07(A)(1) | OAC rule 3745-21-09(U)(1)(d) | The volatile organic compound (VOC) content of any coating employed in this emissions unit shall not exceed 6.5 lbs/gallon, as applied, when coating metal motorcycle parts and any non-metal parts. |
| OAC rule 3745-17-11(B)(1) | 40 CFR Part 63, Subpart MMMM<br>40 CFR Part 63, Subpart PPPP | Particulate emissions (PE) from overspray shall not exceed 5.49 tons/yr. |
| OAC rules 3745-21-08(B) and 3745-23-06(B)<br><br>OAC rule 3745-21-09(U)(2)(f)(ii)<br><br>OAC rule 3745-21-09(U)(1)(a) | | Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:<br><br>5.73 lbs of nitrogen oxides (NOx)/hr and 25.11 tons of NOx/yr;<br>4.82 lbs of carbon monoxide (CO)/hr and 21.09 tons of CO/yr;<br>0.11 lb of PE/hr (filterable) and 0.48 ton of PE/yr (filterable); and<br>0.32 lb of organic compounds (OC)/hr and 1.38 tons of OC/yr.<br><br>See Section A.I.2.e below.<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(C). |
| OAC rule 3745-21-09(U)(1)(c) | | VOC emissions shall not exceed 63.6 tons per rolling, 12-month period, excluding emissions from natural gas combustion. |

| | |
|---|---|
| | See Section A.I.2.d below. |
| See Section A.I.2.c below. | |
| Pursuant to OAC rule 3745-21-09(U)(2)(i), this emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) when coating motorcycles. | The VOC content of any coating employed in K403 shall not exceed 6.5 lbs/gallon, as applied, when coating metal automobile parts. |
| On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. | The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts. |
| This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts. | The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts. |
| | The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids. |
| Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. | See Part II.A.1 of this permit. |
| PE from coating overspray shall not exceed 1.83 lbs/hr, based on Table I from this rule. | |

**2. Additional Terms and Conditions**

**2.a** The emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a control (destruction) efficiency of not less than 90%. Based on emission testing conducted for emissions unit K403 on April 18, 2002, the amount of VOC emissions entering the oven shall be considered to be approximately 3% of the total uncontrolled emissions.

**2.b** The annual PE limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with this emission limitations.

**2.c** The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 63.6 tons of VOC per rolling, 12-month period, calculated using the following formula:

63.6 tons VOC = summation of all coatings and cleanup materials such that {[(Pi) x (VOCpi) x (1-(CE X DRE)] / 2000} - {[(Si) x (VOCsi)] / 2000}

where:

Pi = usage of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
VOCpi = VOC content of coating, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight
CE = capture efficiency (percent of emissions entering the incinerator)
DRE = destruction removal efficiency of the incinerator
Si = recovery of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
VOCsi = VOC content of the recovered coatings, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight

The credit for the recovered materials shall be calculated per Sections A.III.2 and A.III.6 below.

**2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-08869.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

**2.e** Additional natural gas combustion sources (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 57.33 MMBTU/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

## II. Operational Restrictions

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time while the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:

a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each material to show that it is either photochemically reactive, as defined in OAC rule 3745-21-01(C), non-photochemically reactive, and/or exempt as per OAC rule 3745-21-07(G)(9);

b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;

c. the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;

d. the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in lbs/day;

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

f. the average hourly OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in lbs/hr (average).

2. The permittee shall collect and record the following information each month for the purpose of determining rolling, 12-month emissions and material usage, and to document the VOC content of coatings applied in the coating operation:

a. the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;

b. the VOC content of all coatings, as applied, in pounds per gallon or percent, by weight;

c. the VOC content of all coatings, reducing solvents, purge, and cleanup materials, in pounds per gallon or percent, by weight;

d. the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;

e. the calculated total VOC emission rate for all coatings, reducing solvents, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;

f. if a credit for recovered material is to be used, the total amount (gallons) of unused coating and reducing solvent, recovered purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery and/or disposal at an outside facility, and the mass (lbs) of VOC to be credited to the emission calculations for this emissions unit, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested, and calculated as per Section A.III.6.

g. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f, lbs)); and

h. the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit.

3. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating (excluding water and exempt solvents), as applied.

   If the permittee mixes complying coatings at the paint line, it is not necessary to record the VOC content of the resulting mixture.

4. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:

   a. the name and identification of each coating, as applied;

   b. the VOC content of each coating (excluding water and exempt solvents), as applied;

   c. the total number of gallons or pounds of each coating, as applied; and

   d. the daily volume-weighted average VOC content of all coatings, as applied.

5. During any period when coating metal non-motorcycle parts and demonstrating compliance with an applicable pounds of VOC per gallon of solids emission limitation by use of control equipment, the permittee shall collect and record the following information each day:

a. the name and identification number of each coating, as applied;

b. the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;

c. the solids content (percent, by volume), as applied, of each coating;

d. the total number of gallons or pounds of each coating, as applied; and

e. the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

6. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the unused coatings, reducing solvents, recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:

a. the date the recovery drum or tank was emptied;

b. the date the materials from the recovery drum or tank were shipped off site;

c. the number of gallons of materials from the recovery drum or tank shipped off site;

d. the VOC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total VOC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emissions units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.

7. The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

8. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal

incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

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

b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

10. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

a. the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and

b. the total summation of OC, PE, NOx, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

## IV. Reporting Requirements

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

a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day;

b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day;

c. any record showing that the water curtain was not in service when the emissions unit was in operation;

d. all 3-hour blocks of time during which the average combustion temperature

within the thermal incinerator did not comply with the temperature limitation specified above while the emissions unit was in operation;

e. any monthly record showing the use of non-complying coatings, i.e., those coatings exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycle parts, metal automobile parts, or non-metal parts; and

f. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

The quarterly deviation reports referenced above shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Terms and Conditions.

2. When coating metal non-motorcycle parts with compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

3. When coating metal non-motorcycle parts and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

4. When coating metal non-motorcycle parts and complying with a pounds of VOC per gallon of solids emission limitation with the use of a control device, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following emission limitations:

   10.3 lbs VOC/gal of solids for clearcoat
   6.7 lbs VOC/gal of solids for an extreme performance coating
   6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees

Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

5. The permittee shall submit annual reports that specify the total OC, PE, CO, and NOx emissions from natural gas combustion from emissions units K401 through K404, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

a. Emission Limitations:
8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal parts

Applicable Compliance Method:
Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

b. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with this emission limitation 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).

c. Emission Limitation:
1.83 pounds particulate emissions/hr from coating overspray

Applicable Compliance Method:

Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 3745-17-11(B)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
5.49 tons PE/yr from coating overspray

Applicable Compliance Method:
Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system specified in Sections A.II.1, A.III.7, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

e. Emission Limitation:
The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less that 90%. Based on testing conducted on emissions unit K403 on April 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 3% of the total uncontrolled emissions.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the destruction efficiency and determine oven capture through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A for destruction efficiency, the VOC concentration at the source of the coating's application and effluent gas entering and leaving the emission control device and Methods 204A through F for capture efficiency. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emission testing was conducted for the incinerator controlling this emissions unit on April 18, 2002. The emission tests demonstrated compliance with the destruction efficiency limitation for this emissions unit.

f. Emission Limitations:

When coating metal non-motorcycle parts:
4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method:
Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.3, A.III.4, and A.III.5. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

g. Emission Limitation:
6.5 lbs VOC/gallon for any coating applied to metal motorcycle parts, metal automobile parts or non-metal parts

Applicable Compliance Method:
Compliance with this VOC limit may be determined through monthly recordkeeping, as specified in Section A.III.2, of coating usage and the VOC content of each coating applied to metal motorcycles parts, metal automobile parts, and/or non-metal parts in K403. Formulation data from the coating's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

h. Emission Limitations:
Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.73 lbs of NOx/hr;
25.11 tons of NOx/yr;
4.82 lbs of CO/hr;
21.09 tons of CO/yr;
0.11 lb of PE/hr (filterable);
0.48 ton of PE/yr (filterable); and
0.32 lb of OC/hr;
1.38 tons of OC/yr.

Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the

maximum natural gas usage from the units combined, including a 20% safety factor (57,330 ft3/hr), by the emission factors for each pollutant (lbs of pollutant/MM ft3) found in "Compilation of Air Pollutant Emission Factors", the 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.10), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

i. Emission Limitation:
63.6 tons VOC per rolling, 12 month period, excluding emissions from natural gas combustion

Applicable Compliance Method:
Compliance with this emission limitation shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions. Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 months emission calculations.

## VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those identified in PTI 01-6642, issued August 7, 2001.

## 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 |
|---|---|---|
| K403 - MMP Paint Line 3 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator (modification of PTI #01-6642) | Ohio Air Toxic Policy | See Section B.III below. |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (K403) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: ethyl acetate
TLV: 1,441.3 mg/m3
Maximum Hourly Emission Rate: 91.161 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration: 4,206 ug/m3
MAGLC: 34,316.7 ug/m3

Pollutant: 2-ethoxyethanol

TLV: 18.43 mg/m3
Maximum Hourly Emission Rate: 5.031 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 232.2 ug/m3
MAGLC: 438.8 ug/m3

Pollutant: carbon black, after filter
TLV: 3.5 mg/m3
Maximum Hourly Emission Rate: 0.234 lbs/hr with the water curtain control
Predicted 1-Hour Maximum Ground-Level Concentration: 10.79 ug/m3
MAGLC: 83.33 ug/m3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used, 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.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above

changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

1. The terms and conditions of this permit supercede those identified in PTI 01-6642, issued August 7, 2001.

Emissions Unit ID: K404

**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 | OAC rule 3745-31-05(C) |
|---|---|---|
| K404 - MMP Paint Line 4 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator (modification of PTI # 01-08456) | OAC rule 3745-31-05(A)(3) | |
| | | OAC rule 3745-21-09(U)(1) |
| | | OAC rule 3745-21-07(G)(2) |
| | | OAC rule 3745-17-07(A)(1) |
| | | OAC rule 3745-17-11(B)(1) |

| | Applicable Emissions Limitations/Control Measures | |
|---|---|---|
| OAC rules 3745-21-08(B) and 3745-23-06(B) | | 141.2 tons per rolling, 12-month period, excluding emissions from natural gas combustion. |
| OAC rule 3745-21-09(U)(1)(a) | The volatile organic compound (VOC) content of any coating employed in this emissions unit shall not exceed 6.5 lbs/gallon, as applied, when coating metal motorcycle parts and any non-metal parts. | See Section A.I.2.c below.<br><br>Pursuant to OAC rule 3745-21-09(U)(2)(i), this emissions unit is exempt from the requirements of OAC rule 3745-21-09(U)(1) when coating motorcycles. |
| OAC rule 3745-21-09(U)(1)(c) | Particulate emissions (PE) from overspray shall not exceed 8.74 tons/yr. | On any day when employing photochemically reactive coatings and/or cleanup materials to non-metal parts, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day. |
| OAC rule 3745-21-09(U)(1)(d) | Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:<br><br>5.73 lbs of nitrogen oxides (NOx)/hr and 25.11 tons of NOx/yr;<br>4.82 lbs of carbon monoxide (CO)/hr and 21.09 tons of CO/yr;<br>0.11 lb of PE/hr (filterable) and 0.48 ton of PE/yr (filterable); and<br>0.32 lb of organic compounds (OC)/hr and 1.38 tons of OC/yr.<br><br>See Section A.I.2.e below. | This emissions unit is exempt from the emission limitations in OAC rule 3745-21-07(G)(2) when employing only non-photochemically reactive materials or materials exempt under OAC rule 3745-21-07(G)(9) to non-metal parts.<br><br>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.<br><br>PE from coating overspray shall not exceed 2.91 lbs/hr, based on Table I from this rule. |
| 40 CFR Part 63, Subpart MMMM<br>40 CFR Part 63, Subpart PPPP | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2), 3745-21-09(U)(1), 3745-17-07(A)(1), 3745-17-11(B)(1), and 3745-31-05(C).<br><br>VOC emissions shall not exceed | See Section A.I.2.d below.<br><br>The VOC content of any clear coating employed in this emissions unit shall not exceed 4.3 lbs VOC/gal, excluding water and exempt solvents, or if a |

control system is employed, 10.3 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

The VOC content of any extreme performance coating employed shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids when applied to metal, non-motorcycle parts.

The VOC content of any coating applied to metal, non-motorcycle parts and dried at temperatures not exceeding 200 degrees Fahrenheit shall not exceed 3.5 lbs VOC/gal, excluding water and exempt solvents, or if a control system is employed, 6.7 lbs VOC/gal of solids.

See Part II.A.1 of this permit.

**2. Additional Terms and Conditions**

**2.a** The emissions from the oven associated with this emissions unit shall be vented to a thermal incinerator with a control (destruction) efficiency of not less than 90%. Based on emission testing conducted for emissions unit K404 on September 18, 2002, the amount of VOC emissions entering the oven shall be

considered to be approximately 2% of the total uncontrolled emissions.

**2.b** The annual PE limitation is based on the emissions unit's potential to emit; therefore, no additional monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with this emission limitations.

**2.c** The maximum coating and cleanup usage for this emissions unit shall not cause emissions to exceed 141.2 tons of VOC per rolling, 12-month period, calculated using the following formula:

141.2 tons VOC = summation of all coatings and cleanup materials such that {[(Pi) x (VOCpi) x (1-(CE X DRE)] / 2000} - {[(Si) x (VOCsi)] / 2000}

where:

Pi = usage of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
VOCpi = VOC content of coating, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight
CE = capture efficiency (percent of emissions entering the incinerator)
DRE = destruction removal efficiency of the incinerator
Si = recovery of coating, purge, reducing solvent, and cleanup materials, i, in gallons or pounds
VOCsi = VOC content of the recovered coatings, purge, reducing solvent, and cleanup materials, i, in pounds VOC/gallon or percent, by weight

The credit for the recovered materials shall be calculated per Sections A.III.2 and A.III.6 below.

**2.d** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 01-08869.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

**2.e** Additional natural gas combustion sources (no individual burner greater than 10 MMBTU/hr) may be installed in the future without obtaining a permit modification if the requirements of the exemption under OAC rule 3745-31-03(A)(1)(a) are met and the total burner capacity remains below the 57.33 MMBTU/hr specified in the PTI applications. The installation of these sources will not require a permit modification provided that the new sources comply with the emission limitations for natural gas sources specified in Section A.I.1 of this permit An accurate list of the natural gas combustion sources in operation shall be maintained by the facility and made available to Ohio EPA staff upon request.

## II. Operational Restrictions

1. The permittee shall operate the water curtain whenever this emissions unit is in operation.

2. The average temperature of combustion within the thermal incinerator, for any 3-hour block of time while the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day when applying a photochemically reactive material to non-metal:

   a. the company identification for each coating, reducing (thinning) solvent, purge, and cleanup material employed; and documentation on the content of each material to show that it is either photochemically reactive, as defined in OAC rule 3745-21-01(C), non-photochemically reactive, and/or exempt as per OAC rule 3745-21-07(G)(9);

   b. the number of gallons or pounds of each coating, reducing solvent, and photochemically reactive purge and cleanup material employed;

   c. the OC content of each coating, reducing solvent, and photochemically reactive purge and cleanup material, in lbs/gallon or percent, by weight;

   d. the total OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, in

lbs/day;

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

f. the average hourly OC emission rate for all coatings, reducing solvents, and photochemically reactive purge and cleanup materials applied to non-metal, i.e., (d)/(e), in lbs/hr (average).

2. The permittee shall collect and record the following information each month for the purpose of determining rolling, 12-month emissions and material usage, and to document the VOC content of coatings applied in the coating operation:

a. the name and identification of all coatings, reducing solvents, purge, and cleanup materials employed;

b. the VOC content of all coatings, as applied, in pounds per gallon or percent, by weight;

c. the VOC content of all coatings, reducing solvents, purge, and cleanup materials, in pounds per gallon or percent, by weight;

d. the total number of gallons or pounds of each coating, reducing solvent, purge, and cleanup material employed;

e. the calculated total VOC emission rate for all coatings, reducing solvents, purge, and cleanup materials, prior to the credit for recovered materials, in pounds per month;

f. if a credit for recovered material is to be used, the total amount (gallons) of unused coating and reducing solvent, recovered purge and cleanup material collected from this emissions unit, added to the recovery tank/drum, and shipped for recycle/recovery and/or disposal at an outside facility, and the mass (lbs) of

VOC to be credited to the emission calculations for this emissions unit, to demonstrate compliance with the limitation(s) in Section A.I.1, recorded, tested, and calculated as per Section A.III.6;

g. if a credit for recovered materials is used, the adjusted total VOC emissions from all coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit, in pounds or tons (i.e., (e) - (f, lbs)); and

h. the rolling, 12-month VOC emissions from coatings, reducing solvents, purge, and cleanup materials employed in this emissions unit.

3. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by employing only complying coatings, the permittee shall collect and record the following information each month:

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating (excluding water and exempt solvents), as applied.

   If the permittee mixes complying coatings at the paint line, it is not necessary to record the VOC content of the resulting mixture.

4. During any period when coating metal non-motorcycle parts and demonstrating compliance with an emission limitation by determining the VOC content as a daily volume-weighted average, the permittee shall record the following information each day:

   a. the name and identification of each coating, as applied;

   b. the VOC content of each coating (excluding water and exempt solvents), as applied;

   c. the total number of gallons or pounds of each coating, as applied; and

   d. the daily volume-weighted average VOC content of all coatings, as applied.

5. During any period when coating metal non-motorcycle parts and demonstrating compliance with an applicable pounds of VOC per gallon of solids emission limitation by use of control equipment, the permittee shall collect and record the following

information each day:

a. the name and identification number of each coating, as applied;

b. the maximum pounds of VOC/gallon of coating solids, as applied, or the pounds of VOC/gallon of coating solids, as applied, as a daily volume-weighted average for all coatings;

c. the solids content (percent, by volume), as applied, of each coating;

d. the total number of gallons or pounds of each coating, as applied; and

e. the calculated, controlled pounds of VOC/gallon of coating solids, as applied.

6. If a credit for recovered materials from this emissions unit is used to demonstrate compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the unused coatings, reducing solvents, recovered cleanup and purge materials, and the recovery drum or tank serving this/these emissions units:

a. the date the recovery drum or tank was emptied;

b. the date the materials from the recovery drum or tank were shipped off site;

c. the number of gallons of materials from the recovery drum or tank shipped off site;

d. the VOC content of the materials from the recovery drum or tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds or tons) from recovered material (unused coatings and reducing solvents, purge and cleanup materials), to be credited against the total VOC emissions from all coatings, reducing solvents, cleanup and purge, and other materials applied in emissions units K401, K402, K403, and K404, i.e., (c) x (d), and the proportion (%) that was contributed by each emissions unit.

7. The permittee shall maintain records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

8. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's

recommendations, with any modifications deemed necessary by the permittee.

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

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

   b. all 3-hour blocks of time during which the average combustion temperatures within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission tests that demonstrated that the emissions unit was in compliance.

10. The permittee shall maintain the following records for emissions units K401 through K404 for the purpose of determining compliance with the annual natural gas emission limitations:

   a. the total combined natural gas usage for emissions units K401 through K404, in cubic feet; and

   b. the total summation of OC, PE, NOx, and CO emissions from natural gas usage in emissions units K401 through K404, combined, in tons.

## IV. Reporting Requirements

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

   a. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the average hourly organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed to non-metal, an identification of each day during which the organic compound emissions from the coatings, reducing solvents, and photochemically reactive purge/cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day;

c. any record showing that the water curtain was not in service when the emissions unit was in operation;

d. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above while the emissions unit was in operation;

e. any monthly record showing the use of non-complying coatings, i.e., those coatings exceeding 6.5 pounds of VOC per gallon, when coating metal motorcycle parts or non-metal parts; and

f. any monthly record showing an exceedance of the rolling, 12-month VOC emission limitation.

The quarterly deviation reports referenced above shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Terms and Conditions.

2. When coating metal non-motorcycle parts with compliant coatings, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any monthly record showing an exceedance of the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

3. When coating metal non-motorcycle parts and calculating a daily volume-weighted average VOC content, the permittee shall notify the Ohio EPA, Central District Office, in writing, of any daily record showing that the daily volume-weighted average VOC content exceeded the following limitations:

   4.3 lbs VOC/gal for clearcoat
   3.5 lbs VOC/gal for an extreme performance coating
   3.5 lbs VOC/gal for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

   The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

4. When coating metal non-motorcycle parts and complying with a pounds of VOC per gallon of solids emission limitation with the use of a control device, the permittee shall

notify the Ohio EPA, Central District Office, in writing, of any daily record showing an exceedance of the following emission limitations:

10.3 lbs VOC/gal of solids for clearcoat
6.7 lbs VOC/gal of solids for an extreme performance coating
6.7 lbs VOC/gal of solids for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

5. The permittee shall submit annual reports that specify the total OC, PE, CO, and NOx emissions from natural gas combustion from emissions units K401 through K404, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

## V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I shall be demonstrated in accordance with the following methods:

   a. Emission Limitations:
   8 lbs OC/hour and 40 lbs OC/day when applying any photochemically reactive material to non-metal parts

   Applicable Compliance Method:
   Compliance with the hourly and daily OC emission limitations, when using photochemically reactive materials (PRM), may be determined through daily recordkeeping, as specified in Section A.III.1. Formulation data from the manufacturers or U.S. EPA Method 24 shall be used to determine the organic compound content of the coatings, reducing solvents, purge, and cleaning materials to be used in the calculation of emissions.

   If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

   b. Emission Limitation:
   Visible particulate emissions shall not exceed 20% opacity as a 6-minute

average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with this emission limitation 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).

c. Emission Limitation:
2.91 pounds particulate emissions/hr from coating overspray

Applicable Compliance Method:
Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system found in Sections A.II.1, A.III.7, and A.IV.1, and the calculation performed pursuant to OAC rule 3745-17-11(B)(1).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
8.74 tons PE/yr from coating overspray

Applicable Compliance Method:
Compliance with this emission limitation may be based on meeting the requirements for the water curtain control system specified in Sections A.II.1, A.III.7, and A.IV.2 and record keeping of the monthly usage of the coatings applied, and annual calculation of emissions.

e. Emission Limitation:
The bake oven associated with this emissions unit shall be vented to a thermal incinerator with a destruction efficiency of not less that 90%. Based on testing conducted on emissions unit K404 on September 18, 2002, the amount of VOC emissions entering the bake oven shall be considered to be approximately 2% of the total uncontrolled emissions.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the destruction efficiency and determine oven capture through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A for destruction efficiency, the VOC concentration at the source of the coating's application and effluent gas entering and leaving the emission control device and Methods 204A through F for capture efficiency. Alternative U.S. EPA-

approved test methods may be used with prior approval from the Ohio EPA.

Emission testing was conducted for the incinerator controlling this emissions unit on April 18, 2002. The emission tests demonstrated compliance with the destruction efficiency limitation for this emissions unit.

f. Emission Limitations:
When coating metal non-motorcycle parts:
4.3 lbs VOC/gal uncontrolled or 10.3 lbs VOC/gal of solids controlled for clearcoat
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for extreme performance coatings
3.5 lbs VOC/gal uncontrolled or 6.7 lbs VOC/gal of solids controlled for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method:
Compliance with these limitations may be determined through the record keeping, as specified in Sections A.III.3, A.III.4, and A.III.5. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings to be used in the calculation of emissions.

g. Emission Limitation:
6.5 lbs VOC/gallon for any coating applied to metal motorcycle parts or non-metal parts

Applicable Compliance Method:
Compliance with this VOC limitation may be determined through monthly recordkeeping, as specified in Section A.III.2, of coating usage and the VOC content of each coating applied to metal motorcycles parts and/or non-metal parts in this emissions unit. Formulation data from the coating manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, to be used in the calculation of emissions.

h. Emission Limitations:
Emissions from the combustion of natural gas in emissions units K401 through K404, combined, shall not exceed:

5.73 lbs of NOx/hr;
25.11 tons of NOx/yr;

4.82 lbs of CO/hr;
21.09 tons of CO/yr;
0.11 lb of PE/hr (filterable);
0.48 ton of PE/yr (filterable); and
0.32 lb of OC/hr;
1.38 tons of OC/yr.

Applicable Compliance Method:

The hourly emission limitations represent the maximum capacity of the natural gas combustion units of these four emissions units plus a 20% engineering safety factor. These emission limitations were determined by multiplying the maximum natural gas usage from the units combined, including a 20% safety factor (57,330 ft3/hr), by the emission factors for each pollutant (lbs of pollutant/MM ft3) found in "Compilation of Air Pollutant Emission Factors", the 5th Edition of AP-42, Tables 1.4-1 and 1.4-2 (7/98).

Compliance with the annual emission limitations shall be determined by multiplying the actual annual natural gas usage for emissions units K401 through K404, combined (determined through the record keeping required in Section A.III.10), and multiplying by the above AP-42 emission factors and dividing by 2000 pounds per ton.

i. Emission Limitation:
141.2 tons VOC per rolling, 12 month period, excluding emissions from natural gas combustion

Applicable Compliance Method:
Compliance with this emission limitation shall be determined through the record keeping, as specified in Section A.III.2. Formulation data from the material's manufacturers or U.S. EPA Method 24 shall be used to determine the volatile organic compound content of the coatings, purge, reducing solvents, and cleanup materials, to be used in the calculation of emissions. Twelve-month rolling emissions from the emissions unit shall be calculated by adding the current monthly emission calculations to the previous 11 months emission calculations.

## VI. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those identified in PTI 01-8456, issued December 18, 2001.

## 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 |
|---|---|---|
| K404 - MMP Paint Line 4 - metal and non-metal parts coating line with flash-off areas, oven, and thermal incinerator (modification of PTI # 01-08456) | Ohio Air Toxic Policy | See Section B.III below. |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (K404) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: ethyl acetate
TLV: 1,441.3 mg/m3
Maximum Hourly Emission Rate: 91.161 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 4,206 ug/m3
MAGLC: 34,316.7 ug/m3

Pollutant: 2-ethoxyethanol
TLV: 18.43 mg/m3
Maximum Hourly Emission Rate: 5.031 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 232.2 ug/m3
MAGLC: 438.8 ug/m3

Pollutant: carbon black, after filter
TLV: 3.5 mg/m3
Maximum Hourly Emission Rate: 0.234 lbs/hr with the water curtain control
Predicted 1-Hour Maximum Ground-Level Concentration: 10.79 ug/m3
MAGLC: 83.33 ug/m3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used, 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.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

   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

1. The terms and conditions of this permit supercede those identified in PTI 01-8456, issued December 18, 2001.