



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

11/22/2010

Certified Mail

John Eckstein
HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347
East Liberty, OH 43319-9407

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0546000117
Permit Number: P0106341
Permit Type: Initial Installation
County: Logan

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-SWDO; Indiana



Response to Comments

Response to comments for: Permit-To-Install

Table with 2 columns: Field Name, Value. Fields include Facility ID, Facility Name, Facility Description, Facility Address, Permit #, and a public notice summary.

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Oct 6, 2010 Honda of America, East Liberty Plant, addition of thinner/additives to coating

a. Comment:

Due to possible clogging in the bell applicators Honda has requested to combine the overall VOC/OC emissions from the proposed new plastic coating operation. This change would not add to the overall potential limit and would allow for more flexible operation of the emissions unit to address production demands in the future.

b. Response:

The requested changes do not to cause an increase in potential emissions and/ or trigger any additional permit review. The requested changes in overall rolling 12 month VOC/OC emission limitation and associate record keeping has been made in the ST&C's.

2. Topic: Oct 6, 2010 Honda of America, East Liberty Plant, applicability of OAC rule 3745-17-11(C)

a. Comment:

Honda stated that the applicability of OAC 3745-17-11(C) is not appropriate since the particulate emission (PE) from the overspray is covered under BAT determination.

b. Response:

Due to the existing OAC rules which address the requirements of SB265, revised SIP that is under review by the Federal EPA, the existing SIP, and the Federal Court decision about SB265 < 10 ton exemption, it is unclear if this emissions unit is in fact required to be covered under a BAT determination. Based on the Existing SIP and Federal Court, there needs to be a BAT determination; while based on exist OAC rules and the revised SIP which has been submitted to the Federal EPA for review, the PE from overspray is not required to be covered under a BAT determination.

The ST&C's are based on Guidance from Mr. Mike Hopkins, Ohio EPA CO DAPC Assist. Chief. In the ST&C's both situations Existing SIP and revised SIP are addressed.

Until a determine on the SIP's and/or new guidance from Central Office the applicability of OAC rule 3745-17-11© will stay in the ST&C's.



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
HONDA OF AMERICA, EAST LIBERTY PLANT**

Facility ID: 0546000117
Permit Number: P0106341
Permit Type: Initial Installation
Issued: 11/22/2010
Effective: 11/22/2010

**Division of Air Pollution Control
Permit-to-Install
for
HONDA OF AMERICA, EAST LIBERTY PLANT**

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Authorization

Facility ID: 0546000117
Facility Description: Auto Assembly Plant
Application Number(s): A0039461
Permit Number: P0106341
Permit Description: New plastic coating operation for coating large plastic parts
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 11/22/2010
Effective Date: 11/22/2010

This document constitutes issuance to:

HONDA OF AMERICA, EAST LIBERTY PLANT
11000 St. Rt. 347
East Liberty, OH 43319-9407

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director



Authorization (continued)

Permit Number: P0106341

Permit Description: New plastic coating operation for coating large plastic parts

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:

R005

Company Equipment ID:

Injected Parts Coating Line

Superseded Permit Number:

General Permit Category and Type: Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southwest District Office.

- (2) 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 Ohio EPA DAPC, Southwest District Office. 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 A.15. below if no deviations occurred during the quarter.
 - (3) 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 Ohio EPA DAPC, Southwest District Office 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.

5. 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 Ohio EPA DAPC, Southwest District Office 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).

6. Compliance Requirements

- a) 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.
- b) 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.
- c) 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:

- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southwest District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Ohio EPA DAPC, Southwest District Office.

- 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 Ohio EPA DAPC, Southwest District Office. 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) 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.
- b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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.

16. 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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. R005, Injected Parts Coating Line

Operations, Property and/or Equipment Description:

Injected parts coating line, with air supply unit and natural gas fired drying oven

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The VOC/OC content of the coatings employed shall not exceed 1.0 pounds per gallon of coating, as based on a monthly volume weighted average, as applied.
b.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	The controlled particulate emissions from overspray shall not exceed 3.95 pounds per hour. The liquid organic cleanup materials employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon. Emissions from the combustion of natural gas in this emissions unit shall not exceed: 0.02 pounds per hour, nor 0.09 tons per year of PE/PM10; 0.01 pounds per hour, nor 0.044 tons per year of SO2; 1.0 pounds per hour, nor 4.38 tons per year of NOx; 0.84 pounds per hour, nor 3.68 tons per year of CO; and 0.06 pounds per hour, nor 0.25 tons of VOC.
c.	OAC paragraph 3745-31-	

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)b., below.
d.	OAC rule 3745-31-05(D) (to avoid becoming a PSD major facility)	The VOC/OC emissions from this emissions unit shall not exceed 18.4 tons per rolling, 12-month period. This does not include area cleanup wipe that is permitted under emissions unit P021. Particulate emissions (PE)/PM10 shall not exceed 3.1 tons per rolling 12 month period, from overspray.
e.	OAC rule 3745-21-07(G)(2)	See section b)(2)d., c)(1), d)(10), and e)(1), below.
f.	OAC rule 3745-17-10(B)	0.02 lb of PE per mmBTU from the combustion of natural gas
g.	OAC rule 3745-17-11(C)	The use of an overspray control system.
h.	OAC rule 3745-17-07	Visible particulate emissions from the vent serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
i.	40 CFR Part 63, Subpart PPPP	HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 the OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves

the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, as part of the State Implementation Plan, (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), SO₂, NO_x, CO emissions from this emissions unit, and VOC emissions associated with the liquid organic cleanup material, and/or liquid organic additive from this emissions unit since the potential emissions are less than ten tons per year.

- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)e., c)(1), d)(9), and e)(1)d.
- e. The natural gas combustion limitations that were established for PTI purposes to reflect potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- f. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels from the use of coatings and overspray control treatment materials specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC/OC (Tons)
1	1.8
1-2	3.7



1-3	5.5
1-4	7.4
1-5	9.2
1-6	11.0
1-7	12.9
1-8	14.7
1-9	16.6
1-10	18.4
1-11	18.4
1-12	18.4

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation from the use of coatings and over spray control treatment materials for VOC/OC shall be based upon a rolling, 12 month summation as specified in section b)(1)d, of this permit.

c) Operational Restrictions

- (1) The permittee shall not employ photochemically reactive material in this emissions unit.
- (2) The permittee shall install and operate a overspray control system that has a design efficiency of at least 95% for the control of particulate emissions. The control system shall be employed whenever this emissions unit is spray applying coatings. The overspray control system shall be maintained in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) The fuel employed in the heaters and/or ovens shall be only natural gas.

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following monthly records.
 - a. The company identification of each coating and liquid organic additive/thinners employed in the coating operation;
 - b. The VOC/OC content of each coating and liquid organic additive/thinners employed in the coating operation, in pounds per gallon, as applied;
 - c. The amount of each coating and liquid organic additive/thinners employed in the coating operation, in gallon per month;

- d. The VOC/OC emissions from the each coating and liquid organic additive/thinners employed in the coating operation, in pounds per month, (the summation of: (“(1)b.” x “(1)c.”); and
 - e. The monthly volume weighted average lb VOC/gal of coating, including any liquid organic additive/thinners employed, (the summation of: (“(1)d.” / “(1)c.”)).
- (2) This facility shall maintain the following monthly records.
- a. The company identification of each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed;
 - b. The VOC/OC content of each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material, in pounds per gallon, as applied;
 - c. The amount of each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed, in gallon per month;
 - d. The VOC/OC emissions from each coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed, in tons per month, (the summation of: [(“(1)b.” x “(1)c.”)/2000]); and
 - e. The rolling, 12-month total VOC/OC emissions. The rolling, 12-month summation of the total amount of VOC/OC emissions from the coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed (the total amount of VOC/OC emissions for the current month (“(1)d.”) plus the total amount combined of VOC/OC emissions for the 11 previous calendar months).
- (3) During the first 12 calendar months of operation the permittee shall maintain monthly records of the following information:
- a. the VOC/OC emission rate from coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed in this emissions unit, in tons; and
 - b. the cumulative VOC/OC emission rate from coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed in this emissions unit, in tons.
- After the first 12 calendar months of operation, compliance with the rolling 12 month VOC/OC emission limitation from the use of coating, and/or overspray control treatment material shall be demonstrated through section d)(2) of this permit.
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the overspray control system being employed, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall conduct periodic inspections of the overspray control system being employed to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the overspray control system being employed while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the overspray control system being employed and shall maintain the following information:
- the date of the inspection;
 - a description of each/any problem identified and the date it was corrected;
 - a description of any maintenance and repairs performed; and
 - the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (8) The permittee shall maintain records that document any time periods when the overspray control system being employed was not in service when the emissions unit was spray applying coatings, as well as, a record of all operations during which the overspray control system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee.

These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (9) For each day during which the permittee burns a fuel other than natural gas in the heaters and/or ovens. The permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (10) The permittee shall maintain the following monthly records on all liquid organic materials employed in this emissions unit, not involved in metal coating:
- the name and identification number of each liquid organic material employed; and
 - whether or not the liquid organic material contains photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- (11) The permittee shall collect and maintain all applicable records in accordance with the requirements of 40 CFR Part 63, Subpart PPPP and in a manner to demonstrate

continual compliance with the HAP emissions limitation as defined in 40 CFR 63.4490, or the applicable record keeping requirements of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

- (12) This facility shall maintain the following monthly records on the coatings employed in emissions unit R005:
- a. the company identification of each coating material employed;
 - b. the coating usage, in gallons;
 - c. the density of each coating employed, in pounds per gallon;
 - d. the solids content in percent by weight;
 - e. the amount of solids employed, in pounds;
 - f. the assumed transfer efficiency, 35% worst case;
 - g. the assumed overspray control efficiency, 95% worst case;
 - h. the particulate emissions, in tons per month, (the summation of: ({{{("11)e." x (1-("11)f."}) x (1-"11g."))}}); and
 - i. The rolling, 12-month total PE/PM10 emissions from overspray. The rolling, 12-month summation of the total PE/PM10 emissions (the total amount of PE/PM10 emissions for the current month ("11)h.") plus the total amount of PE/PM10 emissions for the 11 previous calendar months).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the coating VOC/OC content 1.0 pounds per gallon of coating, as a monthly volume weighted average, as applied;
 - b. all exceedances of the liquid organic cleanup VOC content 7.25 pounds per gallon;
 - c. all exceedances of rolling, 12-month period VOC/OC limitation of 18.4 tons, from the coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed;
 - d. all exceedances of rolling, 12-month period PE/PM10 limitation of 3.1 tons, from overspray; an identification use of "photochemical reactive material";
 - e. employment of a "photochemical reactive material" in this emissions unit;
 - f. when the overspray control system being employed was not in service when the emissions unit was spray applying coatings, as well as, all operations during which the overspray control system was not operated according to the



manufacturer's recommendations with any documented modifications made by the permittee;

- g. identify each day when a fuel other than natural gas was burned in this emissions unit;
- h. all exceedances of the VOC/OC emission limitation from the use of coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed in this emissions unit for the first 12 calendar months of, as limited in section b)(2)f. and recorded in section d)(2), of this permit; and
- i. Any exceedance of the applicable HAP emissions limitations as defined in 40 CFR Part 63.4490, or any exceedance of the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)], [OAC rule 3745-15-03(C)], and [OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

18.4 tons of VOC per rolling 12 month period, from the coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material employed.

The above limitation is based on the following equation:

$$AER = [(Cu \times Vc) + (Os \times Vc) + (Oc \times Vc)] / 2000$$

Where:

AER = Annual Emission Rate, in tons of VOC per rolling 12 month period;

Cu = Coating usage, in gallons per 12 month period;

Os = Overspray control treatment material, in pounds and/or gallons per 12 month period;

Oc = Liquid organic cleanup/additive material usage, in gallons per 12 month period; and

Vc = VOC content, of coating, liquid organic cleanup material, liquid organic additive, and/or overspray control treatment material, in percent by weight or pounds per gallon.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section d)(2) of this permit.

b. Emission Limitation:

3.95 pounds of particulate emissions (PE) per hour from overspray.

The above limitation is based on the following equation:

$$HER = \{[(Cu \times Cd) \times Sc] \times (1-Te)\} \times (1-Ce)$$

Where:

HER = Hourly Emission Rate, in pounds of PE per hour;

Cu = Coating usage, in gallons per hour, (31.0, from PTI application);

Cd = Coating density, in pounds per gallon, (9.8, from MSD sheet);

Sc = Solid content, in percent by weight, (40%, from MSD sheet);

Te = Transfer efficiency, in percent, (at least 35% assumed based on the use high volume Low pressure coating method, from PTI application); and

Ce = Control efficiency, in percent, (at least 95% assumed based on the use of wet or dry scrubber system).

Applicable Compliance Method:

Compliance with the allowable PE from overspray will be assumed based on the maximum potential coating usage of 31.0 gallons per hour. Prior to any modifications that would increase the hourly potential coating usage, this emissions unit will need additional air pollution permit review.

c. Emission Limitation:

The liquid organic cleanup materials employed in this emissions unit shall not exceed 7.25 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in section d)(2) of this permit.

d. Emission Limitation:

3.1 tons of particulate emissions (PE)/PM10 per year from overspray.

The above limitation is based on the following equation:

$$\text{AER} = \{[(\text{Cu} \times \text{Cd}) \times \text{Sc}] \times (1 - \text{Te})\} \times (1 - \text{Ce})$$

Where:

AER = Hourly Emission Rate, in pounds of PE per hour;

Cu = Coating usage, in gallons per year, (48,000 gallons per rolling 12 month period);

Cd = Coating density, in pounds per gallon, (9.8, from MSD sheet);

Sc = Solid content, in percent by weight, (40%, from MSD sheet);

Te = Transfer efficiency, in percent, (at least 35% assumed based on the use high volume Low pressure coating method, from PTI application); and

Ce = Control efficiency, in percent, (at least 95% assumed based on the use of wet or dry scrubber system).

Applicable Compliance Method:

Compliance with the allowable PE/PM10 from overspray will be based on the record keeping in sections d)(11).

e. Emission Limitation:

Emissions from the combustion of natural gas in this emissions unit shall not exceed:

0.02 pounds per hour, nor 0.09 tons per year of PE/PM10;

0.01 pounds per hour, nor 0.044 tons per year of SO₂;

1.0 pounds per hour, nor 4.38 tons per year of NO_x;

0.84 pounds per hour, nor 3.68 tons per year of CO; and

0.06 pounds per hour, nor 0.25 tons of VOC.

The above limitations are based on the following equations:

$$\text{HER} = [\text{Btu} / (1000 \text{ btu/cf})] \times \text{Ef}$$

$$\text{AER} = (\text{HER} \times 8760) / 2000$$

Where:



HER = Hourly emissions rate, in pounds emitted per hour;

AER = Annual Emission Rate, in tons emitted per year;

Btu = Combined BTU heat input of all three natural gas fired burners associated with this emissions unit, in mmBTU/hr, ((8.0 mmBTU/hr (ASU) + 1.0 mmBTU/hr (Burner #1) + 1.0 mmBTU/hr (Burner #2) = 10 mm BTU/hr combined) from PTI application);

Ef = Emissions factors, in pounds emitted per mmcf, (1.9 PM/PM10, 0.6 SO2, 100 NOx, 84 CO, and 5.5 TOC(VOC), from PTI application calculation sheet and AP-42).

Applicable Compliance Method:

Compliance will be assumed based on the use of natural gas and the record keeping in section d)(8) of this permit.

f. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation:

HAP emissions from this emissions unit shall comply with the requirements of 40 CFR 63.4490, or the applicable HAP(s) limitations as required of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

Applicable Compliance Method:

The permittee shall demonstrate compliance using the applicable requirements as detailed in 40 CFR Part 60 Subpart P, 63.4540 through 63.4568 or the applicable requirement of another final source NESHAP that applies to this facility and determined under 40 CFR 63.4481.

g) Miscellaneous Requirements

(1) None.